

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
(ROANOKE DIVISION)

CASE No.: 7:22 CV 122 - Dillon  
(TO BE ASSIGNED)

RAYMOND A. FORD, JR., #1187664,  
PLAINTIFF,

v.

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

MAR 09 2022

JULIA C. DUDLEY, CLERK  
BY: Albeeson  
DEPUTY CLERK

RALPH NORTHAM, GOVERNOR OF VIRGINIA (FORMER),  
GLENN YOUNGKIN, GOVERNOR OF VIRGINIA (PRESENT),  
HAROLD CLARKE, DIRECTOR OF THE VIRGINIA  
DEPARTMENT OF CORRECTIONS (VDOC), KENSY BOWLES,  
WARDEN OF COFFEEWOOD CORRECTIONAL CENTER  
(CWCC), KIMBERLY SOUTER, J. RUIZ, C. WALKER,  
ASHLYN HARTBOOK, NICK MEYER, ALL EMPLOYEES  
AT CWCC, AND S. MOE-WILLIS, REGIONAL  
OMBUDSMAN FOR THE VDOC,  
DEFENDANTS.

CIVIL RIGHTS ACTION UNDER  
42 U.S.C., SECTION 1983

## PARTIES

PLAINTIFF IS INCARCERATED AT COFFEWOOD CORRECTIONAL CENTER (CWCC), 12352 COFFEWOOD DRIVE, MITCHELLS, VIRGINIA 22729, PHONE NUMBER (540) 829-6483.

DEFENDANT RALPH NORTHAM WAS THE GOVERNOR OF THE COMMONWEALTH OF VIRGINIA AND HIS LAST KNOWN ADDRESS IS THE PATRICK HENRY BUILDING, 3RD FLOOR, 1111 EAST BROAD STREET, RICHMOND, VIRGINIA 23219. HIS LAST DAY OF OFFICE WAS ON OR ABOUT JANUARY 15, 2022.

DEFENDANT GLENN YOUNGKIN IS THE NEW GOVERNOR OF THE COMMONWEALTH OF VIRGINIA, BEGINNING ON JANUARY 15, 2022, AND HIS ADDRESS IS THE SAME AS ABOVE.

DEFENDANT HAROLD CLARKE IS THE DIRECTOR OF THE VIRGINIA DEPARTMENT OF CORRECTIONS (VDOC) AND IS AT 6900 ARMORE DRIVE, RICHMOND, VIRGINIA 23225.

DEFENDANT KENTSY BOWLES IS THE WARDEN OF CWCC.

DEFENDANT KIMBERLY SOUTER IS THE INSTITUTIONAL OPERATIONS MANAGER (IOM) AT CWCC.

DEFENDANT S. RUIZ IS THE GRIEVANCE COORDINATOR AT CWCC.

DEFENDANT C. WALKER IS THE CHIEF OF HOUSING AND PROGRAMS (CHAP) AT CWCC.

DEFENDANT ASHLYN HARTBOOK IS THE INSTITUTIONAL PROGRAM MANAGER (IPM) AT CWCC.

DEFENDANT NICK MEYER IS THE CHAPLAIN AT CWCC AND IS CONTRACTED WITH VDOC THROUGH GRACE INSIDE.

DEFENDANTS BOWLES, SOUTER, RUIZ, WALKER, HARTBOOK AND MEYER ARE AT 12352 COFFEEWOOD DRIVE, MITCHELLS, VIRGINIA 22729, PHONE NUMBER (540) 829-6483.

DEFENDANT S. MOE-WILLIS IS THE REGIONAL OMBUDSMAN FOR THE VDOC AND IS AT 9503-A HULL STREET ROAD, CENTRAL REGIONAL OFFICE, RICHMOND, VIRGINIA 23236.

ALL DEFENDANTS ARE BEING SUED IN THEIR OFFICIAL AND INDIVIDUAL CAPACITIES.

PLAINTIFF WILL NOT PRESUME DEFENDANTS' "RESPONSIBILITIES"

## PREVIOUS LAWSUITS

PLAINTIFF, RAYMOND A. FORD, JR. #187664, HAD FILED A PREVIOUS LAWSUIT IN THE UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA, NORFOLK DIVISION, DISTRICT COURT JUDGE REBECCA BEACH SMITH PRESIDING, ON NOVEMBER 30, 2011, DOCKET NUMBER 2:11-CV-00636-RBS-LRL, AGAINST DENTAL, MEDICAL AND VDOC OFFICIALS DR. JERRY A. MILES, DDS; DR. HAYES; C. BAILEY; R. TYLER; C. SMITH; MS. TURNER; V.M. WASHINGTON; J.C. HOLLOWAY AND FRED SCHALLING. THIS CASE WAS DISMISSED BY FINAL ORDER ON MARCH 24, 2015.

PLAINTIFF TIMELY APPEARED TO THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT.



## GRIEVANCES

As described herein, from pages 57 to 77, and in paragraphs 174 through 195, Plaintiff describes twenty-four (24) complaints, grievances and grievance appeals beginning on or about August 5, 2021 - which were all timely filed.

## STATEMENT OF THE CLAIM

THE STATEMENT OF THE CLAIM IS AS PRESENTED IN  
THE FOLLOWING PAGES.

PLAINTIFF HEREBY DEMANDS A JURY ON ALL  
ISSUES SO TRIABLE.

## COMPLAINT WITH JURY DEMAND

### INTRODUCTION

COMES NOW, Raymond A. Ford, Jr. ("Plaintiff"),  
A STATE PRISONER, PROCEEDING PRO SE, FILING THIS CIVIL RIGHTS  
ACTION FOR DAMAGES AND INJUNCTIVE RELIEF UNDER 42 U.S.C.,  
SECTION 1983, ALLEGING INFRINGEMENT UPON, VIOLATION AND  
DENIAL OF VARIOUS RIGHTS PROTECTED BY THE UNITED STATES  
AND VIRGINIA CONSTITUTIONS, THE RELIGIOUS LAND USE AND  
INSTITUTIONALIZED PERSONS ACT (RLUIPA), THE AMERICANS  
WITH DISABILITIES ACT (ADA), AND THE HEALTH INSURANCE  
PORTABILITY AND ACCOUNTABILITY ACT (HIPAA), WHERE  
VIRGINIA'S GOVERNORS AND OFFICIALS OF THE VIRGINIA DEPARTMENT  
OF CORRECTIONS (VDOC) AND COFFEEWOOD CORRECTIONAL CENTER  
(CWCC), IMPLEMENTED A SO-CALLED "NEW NORMAL", WHICH  
EFFECTIVELY SUSPENDS, SUPPRESSES, LIMITS, OR OVERRIDES ENTIRELY  
THE FEDERAL AND STATE CONSTITUTIONS AND OPERATING PROCEDURES  
(OP) OF THE VDOC, UNLESS PLAINTIFF AND OTHERS SIMILARLY-  
SITUATED FIRST BE "FULLY" "VACCINATED" WITH A COVID-19  
"VACCINE", WHICH, ACCORDING TO PLAINTIFF, IS A PUBLICLY-  
FUNDED BIOLOGICAL WEAPON OF MASS DESTRUCTION (BWMD OR  
BWMD) THAT ACTUALLY CAUSES COVID-19 AND PROMOTES  
MUTATIONS OF COVID-19. ASIDE FROM THE BWMD ISSUES,  
PLAINTIFF HAS NUMEROUS REASONS FOR OBJECTING TO THE  
COVID-19 "VACCINE". PLAINTIFF DOES NOT WANT THIS "VACCINE."

PLAINTIFF ASSERTS THAT, BY MANIPULATING AND INTERFERING  
PLAINTIFF, OTHER VDOC PRISONERS AND STAFF WITH THIS BLIND,  
DEFENDANTS ARE ENGAGED IN A PRACTICE OF GENOCIDE, AS  
WELL AS STATE-SPONSORED MUNCHAUSEN SYNDROME  
BY PROXY DUE TO THE FACT THAT NOT ONLY DOES THE "VACCINE"  
DIRECTLY AND INDIRECTLY CAUSE DEATH, IT ALSO CAUSES AND  
PROLONGS COVID INFECTIONS AND SICKNESS.

PLAINTIFF FURTHER ASSERTS THAT DEFENDANTS'  
ESTABLISHMENT AND ENFORCEMENT OF THE "NEW NORMAL"  
ARE ACTS OF BOTH CESSION AND TREASON AGAINST THE  
PEOPLE, THE COMMONWEALTH OF VIRGINIA, AND THE  
UNITED STATES OF AMERICA. THUSLY, PLAINTIFF SEEKS AN  
ORDER FOR THE IMMEDIATE TERMINATION OF THE "NEW  
NORMAL," AND ALL ACTS RELATED THERETO, TO END THE CONTINU-  
OUS INFRINGEMENT, VIOLATION AND DENIAL OF HIS RIGHTS.

PLAINTIFF ALSO RAISES CLAIM AGAINST DEFENDANTS  
UNDER THE KU KLUX KLAN ACT OF 1871 WHERE DEFENDANTS  
CONSPIRATORIAL ACTIONS TO DENY PLAINTIFF ADEQUATE AND  
MEANINGFUL ACCESS TO THE COURTS AND LEGAL MATERIALS, AND  
ABILITY TO PETITION THE GOVERNMENT FOR REDRESS OF HIS  
GRIEVANCES, EFFECTIVELY AND CONSEQUENTLY PREVENTS PLAINTIFF  
FROM VOTING, HOLDING PUBLIC OFFICE, TESTIFYING IN COURT,  
AND FROM SERVING ON A JURY BECAUSE, WITHOUT SUCH ACCESS  
AND ABILITY, PLAINTIFF IS UNABLE TO CHALLENGE AND BRING TO



AN END HIS UNCONSTITUTIONAL CONFINEMENT, RESTRAINT AND STATE OF CIVIL DEATH.

ADDITIONALLY, PLAINTIFF RAISES CLAIM AND SEEKS DAMAGES UNDER 28 U.S.C., SECTION 1367, FOR INTENTIONAL TORTS AND NEGLIGENCE RELATED TO THE ABOVE VIOLATIONS, AS WELL AS FOR DEFAMATION, SLANDER AND LIBEL, WHERE DEFENDANTS FALSELY AND MALICIOUSLY ALLEGED AND SPREAD RUMOR THAT BECAUSE PLAINTIFF WOULD NOT BE MIXED WITH THE COVID "VACCINE", PLAINTIFF WAS A CONTAGIOUS HEALTH HAZARD TO OTHERS, DESPITE THE FACT THAT PLAINTIFF HAD ALREADY HAD COVID AND WAS THUS NATURALLY IMMUNE TO CONTRACTING AND SPREADING COVID, AND WAS ACTUALLY IN THE SAME IF NOT BETTER SITUATION THAN THOSE WHO HAD BEEN "VACCINATED."

LASTLY, PLAINTIFF SEEKS AN ORDER TO HAVE THE VENTILLATION SYSTEM TURNED ON IN THE HOUSING UNITS AND MORE ACCESS TO OUTSIDE AIR, AND TO END THE TWENTY-THREE AND ONE LOCKDOWN STATUS THAT HAS PERSISTED SINCE MARCH, 2020. SUCH CRUEL AND TORTUROUS ACTS - TO DEPRIVE PRISONERS WITH ACCESS TO FRESH OUTSIDE AIR - MUST END. THIS HOMICIDAL GENOCIDAL PRACTICE BY VIRGINIA, VDOC AND CHCC OFFICIALS - OF DENYING FRESH OUTSIDE AIR DURING A COVID-19 "PANDEMIC" - IS A CRIME AGAINST HUMANITY AND A SHAME TO THE HISTORY OF THE STATE AND THE UNITED STATES.

## FACTS

I. COVID-19 IS A PUBLICLY-FUNDED BIOLOGICAL WEAPON OF MASS DESTRUCTION (WMD OR BWMD) WHICH IS BEING USED AGAINST THE PEOPLE OF THE UNITED STATES AND IS PRIMARILY IMPLEMENTED THROUGH "VACCINES" AND SPREAD TO OTHERS VIA MUCOSAL TRANSMISSION.

### A. WHAT IS A CORONAVIRUS?

1. THE NAME "CORONAVIRUS" IS A NAME GIVEN TO A VIRUS DUE TO ITS DISTINCTIVE SPIKE PROTEINS LINING THE VIRAL SURFACE THAT RESEMBLES A CROWN. WHILE MANY CORONAVIRUSES WERE NOT DISCOVERED UNTIL THE MID-1960'S, THIS FAMILY OF VIRUSES HAS BEEN CIRCULATING AMONG HUMANS AND ANIMALS SUCH AS BIRDS, BATS, AND PIGS FOR CENTURIES, AND SOME DATING TECHNIQUES PLACE ITS ORIGINS ALMOST 11,000 YEARS AGO.

2. RESEARCHERS HAVE IDENTIFIED SEVEN CORONAVIRUSES THAT AFFECT HUMANS, CONSISTING OF FOUR VIRUSES WHICH ARE CONSIDERED LESS SEVERE AND THREE HIGHLY PATHOGENIC ONES: SEVERE ACUTE RESPIRATORY SYNDROME (OR SARS), MIDDLE EAST RESPIRATORY SYNDROME (OR MERS), AND COVID-19 (OR CORONAVIRUS 2019).

## B. WHAT IS "GAIN-OF-FUNCTION" ?

3. IN THE YEARS FOLLOWING THE RELATIVELY MINOR OUTBREAKS OF SARS AND MERS, SCIENTISTS SOUGHT TO STUDY CORONAVIRUS BEHAVIORS IN AN ACCELERATED FASHION, CLAIMING THAT THEY WERE DOING SUCH RESEARCH TO PREDICT AND PREVENT THE NEXT "PANDEMIC." THE PROCESS SCIENTISTS DESIRED TO USE WAS CALLED "GAIN-OF-FUNCTION."

4. "GAIN-OF-FUNCTION" INVOLVES GENETICALLY ALTERING DISEASES TO ENHANCE THEIR VIRULENCE, PATHOGENICITY, AND TRANSFERIBILITY BETWEEN SPECIES TO STUDY HOW THEY MIGHT POTENTIALLY EVOLVE IN NATURE.

5. HOWEVER, IN GAIN-OF-FUNCTION RESEARCH, SCIENTISTS CAN MANIPULATE, ENGINEER AND MODIFY A CORONAVIRUS'S SPIKE PROTEIN - WHICH IS KEY TO THE VIRUS'S ABILITY TO ATTACK HUMAN CELLS. SCIENTISTS DO THIS THROUGH THE SO-CALLED "FURIN CLEAVAGE SITE" OF THE SPIKE PROTEIN WHICH ENHANCES THE ABILITY OF THE ATTACKING VIRUS TO ENTER HUMAN LUNG CELLS AND PRODUCE DISEASE.

6. SUCH RESEARCH HAS OBVIOUS POTENTIAL FOR USE IN THE DEVELOPMENT OF BIO WEAPONS.

### C. BAN ON GAIN-OF-FUNCTION RESEARCH

7. BEGINNING IN 2014, PRESIDENT BARACK OBAMA'S ADMINISTRATION ORDERED A BAN ON GAIN-OF-FUNCTION RESEARCH. U.S. FUNDING FOR ALL GAIN-OF-FUNCTION RESEARCH, BOTH WITHIN THE UNITED STATES AND ABROAD WAS PAUSED IN OCTOBER 2014 DUE TO SAFETY CONCERNS.

8. NEVERTHELESS, BEGINNING IN 2014, THE NATIONAL INSTITUTES OF HEALTH (NIH) AND ITS NATIONAL INSTITUTE OF ALLERGY AND INFECTIOUS DISEASE (NIAID), BEGAN FUNDING ECO HEALTH ALLIANCE WITH ANNUAL GRANTS TOTALING APPROXIMATELY \$3.4 MILLION, WHO IN TURN SENT \$600,000 TO CHINA'S WUHAN INSTITUTE OF VIROLOGY (WIV) OF THE PEOPLE'S MONEY TO CONDUCT GAIN-OF-FUNCTION RESEARCH ON BAT CORONAVIRUSES.

9. IN THE FINAL REPORT FROM THE HOUSE FOREIGN AFFAIRS COMMITTEE MINORITY STAFF REPORT, TITLED "THE ORIGIN OF THE COVID-19 GLOBAL PANDEMIC, INCLUDING THE ROLES OF THE CHINESE COMMUNIST PARTY AND THE WORLD HEALTH ORGANIZATION (SEPTEMBER 21, 2020) STATED MORE SPECIFICALLY:

THIS RESEARCH WAS PARTIALLY FUNDED BY GRANTS FROM THE U.S. NATIONAL INSTITUTE OF ALLERGY + INFECTIOUS

DISEASE AND THE NATIONAL INSTITUTE OF AGING WITHIN THE U.S. NATIONAL INSTITUTES OF HEALTH (NIH), AS WELL AS THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID). THE USAID FUNDING WAS AWARDED TO EcoHEALTH ALLIANCE, WHO PROVIDED THE FUNDING TO THE WIV. EcoHEALTH ALLIANCE IS A NEW YORK BASED GLOBAL HEALTH NONPROFIT FOCUSED ON THE EMERGENCE OF NEW DISEASES AND WAS A USAID PARTNER FOR THE PREDICT PROJECT, WHICH SOUGHT TO IDENTIFY "NEW EMERGING INFECTIOUS DISEASE THAT COULD BECOME A THREAT TO HUMAN LIFE."

#### D. RESEARCH AT WIV, DESPITE THE BAN

10. BEGINNING AROUND 2015, THE PRESIDENT OF EcoHEALTH ALLIANCE, PETER DASZAK, A ZOOLOGIST AND PARASITOLOGIST, WORKED CLOSELY WITH BAT CORONAVIRUS EXPERT SHI ZHENGLI OF THE WIV. THEIR RESEARCH PURSUED HOW BAT CORONAVIRUSES MIGHT EMERGE FROM NATURE AND BECOME A DANGER TO HUMANS, SO THEY SAY.

11. SUCH RESEARCH WAS JOINED BY OTHER RESEARCHERS AT WIV, ALONG WITH RESEARCHERS FROM THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, HARVARD MEDICAL SCHOOL, THE INSTITUTE OF MICROBIOLOGY IN SWITZERLAND, AND THE U.S. NATIONAL CENTER FOR TOXICOLOGY RESEARCH.



12. IN 2015, A PAPER WAS WRITTEN FROM SUCH RESEARCH ENTITLED, "A SARS-LIKE CLUSTER OF CIRCULATING BAT CORONA-VIRUSES SHOWS POTENTIAL FOR HUMAN EMERGENCE."

13. OVER TIME, THEIR EXPERIMENTS BECAME INCREASINGLY PROGRESSIVE, GENETICALLY MODIFYING VIRUSES TO SEE WHAT CAUSED GREATER INFECTIVITY AND TRANSMISSIBILITY FROM BATS TO HUMANS.

14. DETAILS OF THIS RESEARCH ARE DESCRIBED IN GRANT PROPOSALS BY ECOHEALTH ALLIANCE TO THE NIH, RECENTLY MADE PUBLIC BY THE INTERCEPT AFTER A FREEDOM OF INFORMATION ACT (FOIA) LAWSUIT.

15. DURING THE 2015 RESEARCH PROJECT, THIS GROUP OF RESEARCHERS USED A SARS-COV CORONAVIRUS, KNOWN AS WIV1, WHICH IS RELATED TO THE VIRUS THAT CAUSED THE SARS EPIDEMIC OF 2002-2004. THEY GENETICALLY MANIPULATED IT BY INSTALLING SPIKE PROTEINS FROM THREE OTHER RELATED VIRUSES, THEREBY CREATING THREE CHIMERIC (HYBRID) CORONAVIRUSES.

16. THE NEW CORONAVIRUS SPIKE PROTEIN, SHC014, WAS SHOWN TO BIND TO A SPECIAL RECEPTOR (ACE2) IN GENETICALLY MODIFIED "HUMANIZED" MICE, TO DEMONSTRATE THAT SUCH COULD REPLICATE "EFFICIENTLY" IN PRIMARILY HUMAN

LUNG CELLS, AND WITHSTAND ANTIBODIES AND VACCINES THAT WERE AVAILABLE AT THE TIME. THE MANIPULATIONS MADE THE CORONAVIRUSES MORE LETHAL TO THE HUMANIZED MICE.

17. THE SARS-COV VIRUS WAS NOW WEAPONIZED.

#### E. WEAPONIZED SPIKE PROTEIN PATENTS, 2015-2016

18. AGAIN, DESPITE THE BAN ON GAIN-OF-FUNCTION RESEARCH, PATENTS WERE SOUGHT BY SCIENTISTS AT NIH, DARTMOUTH COLLEGE, SCRIPPS RESEARCH INSTITUTE AND BIOTECHNOLOGY COMPANY MODERNA, INC., RELATING TO THE CORONAVIRUSES THAT HAD BEEN WEAPONIZED VIA THE GAIN-OF-FUNCTION RESEARCH.

19. DEMOCRATS IN CONGRESS ARE CURRENTLY IN DISPUTE WITH MODERNA OVER CREDIT AND PATENTS FOR MODERNA'S COVID "VACCINE(S)" DUE TO THE FACT THAT MODERNA (WHOSE COMPANY NAME IS A MASHUP OF "MODIFIED" AND "RNA") USES AND DELIVERS A GENETIC INSTRUCTION FROM NIH'S WEAPONIZED CORONAVIRUS SPIKE PROTEIN TO CAUSE A RECIPIENT'S CELLS TO SELF-PRODUCE THE DEADLY SPIKE PROTEINS.

20. AROUND THE END OF THE OBAMA ADMINISTRATION IN 2017, THE FEDERAL BAN ON GAIN-OF-FUNCTION RESEARCH EITHER LAPSED OR ENDED.

## F. THE 2018 RESEARCH BY EcoHEALTH ALLIANCE AT WIV

21. IN 2018, PETER DASZAK SOUGHT ADDITIONAL FEDERAL FUNDING BY SUBMITTING A PROPOSAL TO THE DEFENSE ADVANCED RESEARCH PROJECTS AGENCY (DARPA), TITLED, "PROJECT DEFUSE," WHERE DASZAK PROPOSED TO IDENTIFY AND "DEFUSE" EMERGING DANGERS IN BAT CORONAVIRUSES.

22. THE ONLY "EMERGING DANGERS", HOWEVER, WERE THE ONES THAT HE AND OTHERS SO INVOLVED WERE CREATING.

23. ONE LAB EXPERIMENT DASZAK SUGGESTED IN THE PROPOSAL WOULD ENGINEER A FURIN CLEAVAGE SITE ONTO THE BACKBONE OF A CORONAVIRUS. THIS WOULD ENHANCE THE VIRUS TO BETTER INFECT HUMAN CELLS.

24. THE WIV WAS A PARTNER IN THE PROPOSAL, ALONG WITH A LAB AT THE UNIVERSITY OF NORTH CAROLINA AND OTHERS.

25. WHILE NIH HAD BEEN PREVIOUSLY FUNDING EcoHEALTH ALLIANCE IN SUCH RESEARCH DESPITE THE 2014-2017 BAN ON GAIN-OF-FUNCTION RESEARCH, DARPA REJECTED DASZAK'S PROPOSAL, SAYING THAT IT INCLUDED POTENTIAL GAIN-OF-FUNCTION RESEARCH.

26. "DID DASZAK PROCEED ANYWAY?", SCIENTISTS ASKED.

## 9. EXPERTS SUSPECT OUTBREAK IS A BLIND

27. "A FEW MONTHS BEFORE COVID-19 BECAME A PANDEMIC, FILIPPA LENTZOS STARTED READING ABOUT UNUSUAL FLU CASES IN WUHAN, CHINA. MS. LENTZOS, A SOCIAL SCIENTIST WHO STUDIES BIOLOGICAL THREATS, BELONGS TO AN EMAIL GROUP SHE DESCRIBES AS CONSISTING OF 'EX-INTELLIGENCE, BIOWEAPONS SPECIALISTS, EXPERTS, FORMER STATE DEPARTMENT DIPLOMATS' AND OTHERS 'WHO HAVE WORKED IN ARMS CONTROL, BIOLOGICAL DISARMAMENT'.

28. "AS CHINESE AUTHORITIES STRUGGLED TO CONTAIN THE OUTBREAK, SHE RECALLS, THE EXPERT CIRCLE ASKED QUESTIONS ABOUT THE PATHOGEN'S ORIGIN: 'IS THIS SECURITY RELATED? IS IT MILITARY? IS THERE SOMETHING DODGY GOING ON? WHAT INFORMATION ARE WE NOT GETTING HERE?'

29. "THEY ASKED THESE QUESTIONS 'NOT BECAUSE WE ARE CONSPIRACY THEORISTS. THIS IS OUR PROFESSION,' MS. LENTZOS, 44, SAYS IN A VIDEO INTERVIEW FROM HER HOME IN SWITZERLAND.

30. "AS THE CORONAVIRUS AND ALARM ABOUT IT SPREAD, NON-EXPERTS STARTED ASKING SIMILAR QUESTIONS - ONLY TO BE MOCKED OR SILENCED BY JOURNALISTS, SOCIAL-MEDIA COMPANIES AND PROMINENT SCIENTISTS.



31. "By spring 2020, top Republicans - including Arkansas Sen. Tom Cotton, Secretary of State Mike Pompeo, and President Donald J. Trump - were arguing that the pandemic could have started at the Wuhan Institute of Virology, which had conducted experiments on coronaviruses.

32. "For me, the lab leak was always on the table," Ms. Lentz says. "For a lot of us in the biological weapons security world."

33. Likewise, on February 1, 2020, a team of experts comprised of nearly a dozen top international experts on viral genome evolution - hailing from the United States, the United Kingdom, Germany, the Netherlands and Australia - convened for a teleconference. The team had been scrutinizing the virus's genetic sequence, which had been uploaded to the Internet three weeks earlier.

34. A few were alarmed by some of the virus's attributes, particularly how it clawed its way into human cells.

35. The team had compared the virus's genome to that of RaTG13, a coronavirus discovered in horseshoe bats in China in 2013 and the closest known relative of SARS-CoV-2, with about 96 percent



SIMILARITY. A FEW ON THE CALL BELIEVED SOME OF THE NEW VIRUS'S SIGNATURES SUGGESTED POSSIBLE HUMAN MANIPULATION.

36. OVER THE COURSE OF AN HOUR, THEY DISCUSSED WHETHER THE VIRUS'S "FUZIN CLEAVAGE SITE" IN THE SPIKE PROTEIN, WHICH IS KEY TO THE VIRUS'S ABILITY TO ATTACK HUMAN CELLS, COULD HAVE BEEN ENGINEERED.

37. THE VIRUS ALSO HAD A NUMBER OF OTHER UNIQUE FEATURES THAT MAKE IT HIGHLY EFFICIENT AT INFECTING HUMANS.

38. A DAY BEFORE THE CALL, KRISTEN ANDERSEN, A PROFESSOR IN THE DEPARTMENT OF IMMUNOLOGY AND MICROBIOLOGY AT SCRIPPS RESEARCH IN LA JOLLA, CALIFORNIA, HAD WRITTEN TO ANTHONY S. FAUCI, THE DIRECTOR OF THE NATIONAL INSTITUTE OF ALLERGY AND INFECTIOUS DISEASE: "THE UNUSUAL FEATURES OF THE VIRUS MAKE UP A REALLY SMALL PART OF THE GENOME (< 0.1 %) SO ONE HAS TO LOOK REALLY CLOSELY AT ALL THE SEQUENCES TO SEE THAT SOME OF THE FEATURES (POTENTIALLY) LOOK ENGINEERED."

39. ANDERSON WROTE THAT HE AND THREE COLLEAGUES "ALL FIND THE GENOME INCONSISTENT WITH EXPECTATIONS FROM EVOLUTIONARY THEORY."

40. DURING INVESTIGATIONS IN 2020, DAVID ASHER, SENIOR ADVISER IN THE STATE DEPARTMENT'S BUREAU OF ARMS CONTROL, VERIFICATION AND COMPLIANCE SUSPECTED THAT COVID-19 WAS THE RESULT OF A COLLABORATIVE EFFORT BETWEEN THE CHINESE GOVERNMENT, THE PEOPLE'S LIBERATION ARMY, AND THOSE RESEARCHERS INVOLVED AT WIV, TO RESEARCH AND DEVELOP BIOWEAPONS.

#### H. THE ATTEMPTED COVER-UP BY ANTHONY FAUCI

41. MEMBERS OF CONGRESS AND RESEARCHERS HAVE STATED THAT THE COVID-19 OUTBREAK IS CLOSELY CONNECTED TO THE SAME SORT OF U.S. FUNDED GAIN-OF-FUNCTION RESEARCH CONDUCTED ON BAT CORONAVIRUSES AT WIV.

42. WHEN ASKED BY MEMBERS OF CONGRESS, ESPECIALLY SEN. RAND PAUL (KY.), DR. ANTHONY FAUCI, DIRECTOR OF NIH'S NIAID, DENIED FUNDING IN ANY WAY GAIN-OF-FUNCTION RESEARCH IN WIV LABS.

43. DR. FAUCI ALSO DENIED A LABORATORY ORIGIN FOR THE COVID-19 VIRUS, BUT STATED INSTEAD THAT SARS-CoV-2'S COVID-19 VIRUS ORIGINATED FROM NATURE AND JUMPED FROM ANIMALS TO HUMANS, CAUSING THE WORLD-WIDE SPREAD OF INFECTIONS, SICKNESS AND DEATH.

44. LIKEWISE, FACEBOOK CLASSIFIED ANY ALLEGATION THAT COVID-19 WAS THE RESULT OF SCIENTIFIC DEVELOPMENT OR THAT COVID-19 LEAKED FROM A LAB AS "MISINFORMATION." FACEBOOK BANNED ALL POSTS ALLEGING OR ASSERTING THAT THE VIRUS ORIGINATED IN A LAB OR LEAKED FROM THE WIV LAB TO THE PUBLIC.

45. FRANCIS COLLINS AND OTHER SCIENTISTS WITH INTERESTS IN WIV gain-of-function RESEARCH, SUCH AS PETER DASZAK, WHO RUNS THE NONPROFIT ECOHEALTH ALLIANCE, ALSO DENIED ALLEGATIONS THAT COVID-19 WAS MAN-MADE OR LEAKED FROM ANY LAB, AND DISMISSED SUCH ALLEGATIONS AS BASELESS "CONSPIRACY THEORIES."

46. FAUCI, COLLINS, DASZAK AND FACEBOOK COOPERATED TO DENY AND SHUT DOWN INVESTIGATION ON THE ORIGIN OF COVID-19.

## I. UNCOVERING THE COVER-UP

47. UNFORTUNATELY FOR DR. FAUCI, FRANCIS COLLINS, AND PETER DASZAK, RESEARCHERS AND REPORTERS HAVE FOUND AND ACCUMULATED EVIDENCE THAT CLEARLY DEMONSTRATES A CONNECTION BETWEEN NIH, NIAID, ECOHEALTH ALLIANCE AND THE COVID-19 "OUTBREAK" AND "PANDEMIC."

48. EMAILS UNCOVERED VIA THE FREEDOM OF INFORMATION ACT (FOIA) HAVE REVEALED THAT DR. FAUCI WAS AWARE OF A CONNECTION BETWEEN GAIN-OF-FUNCTION RESEARCH IN WIV FUNDED BY THE U.S. VIA ECOHEALTH ALLIANCE AND THE COVID-19 "PANDEMIC." SUCH EMAILS ALSO UNCOVERED AN ATTEMPT BY DR. FAUCI TO HIDE INFORMATION AND MISLEAD INVESTIGATORS AND RESEARCHERS.

49. IT IS ALSO REPORTED THAT THERE WERE UNDISCLOSED REPORTS OF THREE (3) SCIENTISTS FROM THE WIV LAB WHO WERE HOSPITALIZED IN OCTOBER - NOVEMBER, 2019, WITH WHAT ARE NOW KNOWN TO BE COVID-LIKE SYMPTOMS.

50. SINCE THE DISCLOSURE OF SUCH EMAILS AND REPORTS, NOT ONLY HAS DR. FAUCI BEGUN TO ADMIT THAT A LAB LEAK FROM WIV IS POSSIBLE - IF NOT PROBABLE - AND REQUIRES SERIOUS INVESTIGATION, BUT FACEBOOK ALSO HAS LIFTED ITS SO-CALLED MISINFORMATION BAN AGAINST POSTS ALLEGING THAT COVID-19 IS MAN-MADE OR MANUFACTURED.

51. FURTHERMORE, DESPITE DR. FAUCI'S DENIALS THAT GAIN-OF-FUNCTION RESEARCH WAS CONDUCTED IN THE WIV LAB, THE NIH HAS SINCE ADMITTED TO HAVING FUNDED GAIN-OF-FUNCTION RESEARCH IN THE WIV LAB THROUGH THE NONPROFIT ECOHEALTH ALLIANCE.

52. DR. FRUZI THEN DISPUTED THE EXACT DEFINITION OF "GAIN-OF-FUNCTION RESEARCH" - EVEN GOING TO HIS WEBSITE TO CHANGE THE DEFINITION, AS POINTED OUT BY SEN. RAND PAUL. HOWEVER, NIH'S PRINCIPAL DEPUTY DIRECTOR, LAWRENCE A. TABBAK, WROTE IN A LETTER TO CONGRESS THAT NIH HAD FUNDED SUCH RESEARCH THROUGH ECOHEALTH ALLIANCE DURING THE FIVE-YEAR PROGRAM AT WIV.

53. IN HIS LETTER, MR. TABBAK CLAIMS THAT ECOHEALTH VIOLATED THE TERMS OF ITS GRANT STIPULATING THAT IT HAD TO REPORT IF ITS RESEARCH INCREASED THE VIRAL GROWTH OF A PATHOGEN BY TENFOLD - TERM THAT NIH INSERTED "OUT OF AN ABUNDANCE OF CAUTION AND AS AN ADDED LAYER OF OVERSIGHT."

54. NIH HAS DEMANDS THAT ECOHEALTH ALLIANCE TURN OVER ONLY UNPUBLISHED DATA FROM AN EXPERIMENT CONDUCTED AT THE WIV THAT SHOWED THAT LABORATORY MICE BECAME UNEXPECTEDLY SICKER WITH ONE OF THE NATURALLY CIRCULATING STRAINS OF BAT CORONAVIRUS.

55. ACCORDING TO NIH, THIS WAS A SIGNIFICANT EXPERIMENTAL FINDING, AND ECOHEALTH DID NOT PROMPTLY REPORT IT AS REQUIRED BY THE GRANT.



56. THE GRANT TO ECOHEALTH HAS BEEN SUSPENDED, ACCORDING TO FRANCIS COLLINS. "THEY MESSED UP HERE. THERE'S GOING TO BE SOME CONSEQUENCES FOR ECOHEALTH," HE SAID.

57. BUT, "THIS ISN'T THE ONLY SITUATION. ECOHEALTH EXPERIMENT COMING TO LIGHT NEARLY TWO YEARS AFTER COVID BROKE OUT. THE INTERCEPT REPORTED LAST MONTH (SEPTEMBER, 2021) THAT ECOHEALTH VIOLATED THE TERMS OF ITS GRANT AT LEAST FOUR TIMES BY 'CREATING NEW VIRUSES USING DIFFERENT PARTS OF EXISTING BAT CORONAVIRUSES AND INSERTING THEM INTO HUMANIZED MICE' IN THE WUHAN LAB, WHICH WAS OVERSEEN BY THE NIAID'S FAUCI-LED NATIONAL INSTITUTES OF ALLERGY AND INFECTIOUS DISEASES."

58. MOREOVER, IT IS REPORTED THAT NIAID DELETED GENETIC SEQUENCE DATA ABOUT THE COVID-19 VIRUS FROM AN AGENCY-RUN ARCHIVE AFTER INQUIRIES ABOUT ORIGIN AND INVOLVEMENT WERE RAISED IN EARLY 2020.

59. A VIROLOGIST AT THE FRED HUTCHINSON CANCER RESEARCH CENTER IN SEATTLE, DR. JESSE BLOOM, REPORTED ABOUT THE DELETED GENETIC SEQUENCES AND STATED THAT SUCH DELETIONS "SUGGESTS A LESS THAN WHOLEHEARTED EFFORT TO MAXIMIZE INFORMATION ABOUT VIRAL SEQUENCES FROM EARLY IN THE WUHAN PANDEMIC."

60. ALMOST A YEAR AFTER THE DELETION, THE SEQUENCES HAVE BEEN REPOSTED.

### J. WIV "VACCINE" TRIAL, AKA: "LAB LEAK"

61. DUE TO THE FACT THAT THE EXACT CAUSE OF THE ORIGINAL PANDEMIC IN CHINA WITH THE SARS-COV-2 HAS NOT BEEN OFFICIALLY DECLARED, MANY SCIENTISTS, RESEARCHERS AND CONGRESS PERSONS ARE CALLING FOR A HALT TO SUCH RISKY RESEARCH AND DEVELOPMENT AS THAT CONDUCTED IN WIV UNTIL BETTER SAFETY MEASURES AND REGULATIONS ARE IN PLACE.

62. IN THE CASE OF SARS-COV-2, THE "VACCINES" ARE JUST AS RISKY - IF NOT EVEN MORE RISKY - AS THE RESEARCH AND DEVELOPMENT OF THE MODIFIED CORONAVIRUS ITSELF DUE TO THE FACT THAT THE "VACCINES" DELIVER A GENETIC INSTRUCTION TO CAUSE HUMAN CELLS TO SELF-PRODUCE THE DEADLY SPIKE PROTEIN.

63. NOTE: NO "OFF-SWITCH" IS DESCRIBED; SELF-PRODUCTION TO WHAT END? OVERWHELMING THE SYSTEM AND SIBODING TO OTHERS?

64. IN THIS CASE, IT IS REPORTED THAT THREE (3) SCIENTISTS FROM THE WIV LAB WHO WERE DEVELOPING THE WEAPONIZED CORONAVIRUS WERE HOSPITALIZED IN OCTOBER -

NOVEMBER, 2019, WITH WHAT ARE NOW KNOWN TO BE COVID-LIKE SYMPTOMS. SUBSEQUENTLY, THERE WAS AN EPIDEMIC OF COVID IN THE AREA SURROUNDING THE THREE SCIENTISTS' WORKPLACE AND TRAVELS.

65. THERE ARE NUMEROUS REPORTS OF SCIENTISTS INTENTIONALLY EXPOSING THEMSELVES, FAMILY, FRIENDS OR OTHERS, WITH OR WITHOUT THEIR KNOWLEDGE, WITH THE VIRUS BEING STUDIED, OR WITH THE "VACCINE" RELATING TO THE VIRUS.

66. IT IS REPORTED THAT, "IN 1942... A PAIR OF GERMAN RESEARCHERS INTENTIONALLY EXPOSED THEMSELVES TO THE TOXIN [TETANUS] TO TEST THE FINDINGS OF PREVIOUS ANIMAL STUDIES."

67. "ONE OF THEM GAVE HIMSELF TWO LETHAL DOSES OF TETANUS IN HIS THIGH, AND MONITORED HOW WELL IT WENT," SAID DR. MARK SUFKA, A PROFESSOR AT OREGON HEALTH & SCIENCE UNIVERSITY. "HIS CO-AUTHOR DID THREE LETHAL DOSES."

68. IT IS REPORTED THAT, "RESEARCHERS IN THE U.K. HAVE DELIBERATELY INFECTED 30 VOLUNTEERS WITH THE VIRUS THAT CAUSES COVID-19, IN THE FIRST HUMAN CHALLENGE STUDY OF THE DISEASE."

69. "INFECTING THE VOLUNTEERS - WHO ARE HEALTHY, UNVACCINATED AND RANGE IN AGE FROM 18 TO 30 - WILL ALLOW THE SCIENTISTS TO OBSERVE IN REAL TIME HOW THE VIRUS ATTACKS THE BODY AND, FROM THE MOMENT OF EXPOSURE, HOW THE IMMUNE SYSTEM RESPONDS."

70. OBVIOUSLY, SUCH PRACTICES WOULD SUBJECT THE UNSUSPECTING SURROUNDING PUBLIC TO THE RISK OF INFECTION, SICKNESS AND DEATH.

### K. DOMESTIC GUERRILLA CIVIL WAR DURING TRUMP ERA

71. IN RECENT YEARS, THERE HAS BEEN AN EXPLOSION IN RACIAL JUSTICE PROTESTS, WHITE-NATIONALIST MILITIAS, WARS AGAINST THE POLICE AND LOCAL STATE GOVERNMENTS, INCIDENTS LIKE THE CHOP (CAPITOL HILL OCCUPIED PROTEST, IN SEATTLE, WASHINGTON), DOMESTIC TERRORISM, AND THE POLICE BETRAYAL AGAINST THE GOVERNMENT.

72. PRESIDENT DONALD J. TRUMP, WHO FOUND HIS ADMINISTRATION TO BE A TARGET OF VIOLENT OPPOSITION, REPEATEDLY ENCOURAGED OR DIRECTLY COMMANDED VIOLENCE TOWARDS PROTESTORS AND CITIZENS.

73. WHEN DONALD TRUMP, HAD RECEIVED CONFIRMATION THAT THE DEADLY SARS-CoV-2 CORONAVIRUS HAD BEEN

DEVELOPED AND WAS RELEASED, MR. TRUMP DOWNPLAYED THE DANGERS OF THE DEADLY VIRUS TO THE PEOPLE OF THE UNITED STATES, CAUSING THEM TO DROP THEIR GUARD.

74. MEANWHILE, PRESIDENT TRUMP WAS FORMULATING OPERATION WARP SPEED, ALSO KNOWN AS "MANHATTAN PROJECT 2," TO MASS-PRODUCE AND DEPLOY THE SHOTS THAT WOULD DELIVER A GENETIC INSTRUCTION TO CAUSE A RECIPIENT'S FORMERLY HEALTHY CELLS TO START TO SELF-PRODUCE COVID-19 SPIKE PROTEINS - SOMETHING THE BODY WOULD NEVER PRODUCE ON ITS OWN.

#### L. MANHATTAN PROJECTS 1 & 2

75. IN MANHATTAN PROJECT 1, SCIENTISTS ALBERT EINSTEIN AND LEO SZILARD DEVELOPED FOR THEN-PRESIDENT FRANKLIN D. ROOSEVELT, A NUCLEAR BOMB - A WEAPON OF MASS DESTRUCTION - DEVELOPED IN A MASSIVE, BUT SECRET, PROGRAM WHICH WAS STAFFED BY HUNDREDS OF SCIENTISTS IN 30 SECRET LOCATIONS.

76. IN A SHORT TIME AFTER FINAL TESTING OF THE NUCLEAR BOMB, ROOSEVELT ISSUED AN ULTIMATUM ON THE NATION THAT ATTACKED THE UNITED STATES AND THEN DROPPED THE BOMB ON THE JAPANESE PEOPLE, KILLING OVER 200,000 PEOPLE IMMEDIATELY, AND MANY MORE FROM



SUBSEQUENT FALLOUT.

77. LIKEWISE, SINCE THE START OF TODAY'S MANHATTAN PROJECT 2, OVER 900,000 U.S. CITIZENS HAVE BEEN KILLED BY COVID-19, THE BWMD.

### M. BWMD'S IN MP2'S OPERATION WARP SPEED

78. DESPITE THE FACT THAT THE U.S. FOOD AND DRUG ADMINISTRATION (FDA) HAS CURRENTLY EITHER AUTHORIZED COVID-19 "VACCINES" IN THE U.S. UNDER AN EMERGENCY USE AUTHORIZATION (EUA) OR GRANTED THEM AN APPROVED STATUS, EVEN SCIENTISTS, RESEARCHERS AND VACCINE MAKERS ADMIT THAT COVID-19 "VACCINES" WERE RUSHED, ARE EXTREMELY UNSTABLE, UNVERIFIED, AND WILL BE USED TO CHANGE ONE'S DNA.

79. IN CERTAIN "VACCINES", SUCH AS WITH JOHNSON & JOHNSON'S VIRAL-VECTOR "VACCINES", SUCH "VACCINES" WERE DEVELOPED USING FAILED HIV/AIDS "VACCINE" PLATFORMS, WHICH WERE ACTUALLY MAKING MEN MORE SUSCEPTIBLE TO BE INFECTED WITH HIV/AIDS.

80. BOTH mRNA "VACCINES", AS THOSE MADE BY DR. UGUR SAHIN AND HIS WIFE DR. OZLEM TURECI, HEADS OF THE GERMAN BIOTECH COMPANY BIO NTECH, AND MR. STÉPHANE BANCEL,

HEAD OF MODERNA, INC., IN CAMBRIDGE MASSACHUSETTS, AND VIRAL-VECTOR "VACCINES," AS THOSE MADE BY U<sup>2</sup>U'S TEAM HEADED BY ITS CHIEF SCIENTIFIC OFFICER DR. PAUL STOFFELS, WERE RUSHED THROUGH FROM CONCEPT TO MASS-PRODUCTION VIA OPERATION WARP SPEED.

81. THE TRUMP ADMINISTRATION FORMULATED "OPERATION WARP SPEED" WHICH ORGANIZED GOVERNMENT AGENCIES AND PRIVATE COMPANIES AROUND THE GOAL OF DEVELOPING, MANUFACTURING AND DISTRIBUTING HUNDREDS OF MILLIONS OF VACCINE DOSES.

82. THE OPERATION HAD ALSO SPEEDED UP THE TESTING PROCESS THAT LEADS TO FDA APPROVAL. THE INCREASE IN SPEED COMES FROM "ADMINISTRATIVE STREAMLINING" ... ALLOWING VACCINE MAKERS TO DO IN SIX TO SEVEN MONTHS WHAT WOULD USUALLY TAKE SIX TO SEVEN YEARS.

83. "AS SOON AS VACCINES WERE IN TECHNICAL WORK, SO STILL IN THE LAB AND IN ANIMALS, WE WERE ALREADY PREPARING THE SITES FOR THE PHASE 1 TRIAL, BUT ALSO, CRITICALLY FOR THE PHASE 2 AND PHASE 3 TRIALS," SAID MONCEF SLADUI, A MORROCCAN-BORN BELGIAN-AMERICAN SCIENTIST WHO SUPERVISED VACCINE DEVELOPMENT AT THE U.K. DRUGMAKER GLAXO-SMITH KLINE FROM 1988 TO 2017, AND HEAD OF OPERATION WARP SPEED.

84. "REPORTS ARE ANALYZED INSTANTLY. 'THE REPORTS ARE PREWRITTEN WITHOUT THE DATA, SO THAT WHEN THE DATA COMES, THE FRAMEWORK OF THE REPORT IS READY - OF COURSE INTERPRETED BASED ON THE DATA AND THE SCIENCE,'" SAID MUNEEF SLADUI.

85. "VACCINE MAKERS THEN 'SUBMIT THE REPORTS TO THE FDA, THE FDA LOOKS INTO THEM - MAXIMUM ONE WEEK - AND GIVES THE GREEN LIGHT TO GO INTO THE NEXT PHASE DEPENDING ON THE TERMINOLOGY AND THE LEVEL OF COMFORT WITH PERFORMANCE OF THE VACCINE IN THE STUDIES,'" SAID SLADUI.

86. "OPERATION WARP SPEED LOOKS PAST APPROVAL TO MANUFACTURING AND DISTRIBUTION. IT HAS FUNDED MANUFACTURING IN ADVANCE OF HUNDREDS OF MILLIONS OF DOSES OF THE VACCINE CANDIDATES AND IS WORKING TO ENSURE THAT VACCINES ARE SEAMLESSLY DISTRIBUTED TO DOCTORS' OFFICES AND PHARMACIES ONCE THEY'VE BEEN APPROVED."

87. OPERATION WARP SPEED BROUGHT TOGETHER SOME OF THE WORLD'S BIGGEST DRUGMAKERS - WHOM ARE NORMALLY RIVALS ENGAGED IN BITTER COMPETITION, PRODUCT DISPUTES AND PATENT WARS - FOR THE SOLE PURPOSE OF DISTRIBUTING AS MUCH OF THE "VACCINES" AS POSSIBLE. "THIS IS A TIME WHEN THE PHARM COMPANYIES ARE SAYING, 'WE'LL GO BACK TO FIGHTING

WHEN THIS IS OVER. WE'LL TAKE YOU TO THE CLEANERS AND MAYBE  
DRIVE YOU TO BANKRUPTCY, BUT RIGHT NOW WE NEED TO BE WORKING  
TOGETHER."

88. MONCEF SLAOUL, HEAD OF OPERATIONS WARP SPEED, AKA  
MANHATTAN PROJECT 2, WAS LATER FIRED BY BIO-TECH COMPANY  
GLAXO-SMITHKLINE PLC FOR SEXUAL HARASSMENT. SUCH CLAIMS  
WERE INDEPENDENTLY INVESTIGATED AND SUBSTANTIATED, AND WERE  
FOUND "TO VIOLATE OUR COMPAN[IES] POLICIES, OUR VALUES, AND  
OUR COMMITMENT TO TRUST," SAID GLAXO CHIEF EXECUTIVE  
EMMA WAUNSLEY.

#### IV. COVID INCREASE DUE TO "VACCINE" TESTING IN 2020

89. ON OR ABOUT JULY 9, 2020, "A NETWORK OF MORE  
THAN 100 CLINICAL TRIAL SITES AT HOSPITALS AND MEDICAL  
CLINICS IN THE UNITED STATES AND ACROSS THE WORLD  
[TOOK] ON THE UNPRECEDENTED CHALLENGE OF TESTING COVID-19  
VACCINES."

90. THE TRIALS INVOLVED "THOUSANDS OF VOLUNTEERS IN A  
GARGANTUAN SCIENTIFIC, MEDICAL AND LOGISTICAL UNDERTAKING...  
[IN] A PHASED SYSTEM OF TRIALS THAT GROW PROGRESSIVELY  
LARGER."

91. THE FIRST LATE-STAGE "VACCINE" TRIAL, IN WHICH 30,000 PEOPLE WERE RANDOMLY ASSIGNED TO RECEIVE EITHER AN EXPERIMENTAL VACCINE MADE BY THE BIOTECHNOLOGY COMPANY, MODERNA OR A PLACEBO, BEGAN IN THE SECOND HALF OF JULY, 2020.

92. AT LEAST FIVE SUCH LARGE "VACCINE" TRIALS WERE CONDUCTED IN THE FOLLOWING MONTHS IN 2020.

93. IN ORDER TO MAKE THE SO-CALLED "VACCINES", SCIENTISTS TAKE THE DEADLY SPIKE PROTEIN OF THE CORONAVIRUS WHICH HAD BEEN PREVIOUSLY AMPLIFIED IN A PROCESS CALLED "GAIN-OF-FUNCTION," EXTRAPOLATE THE GENETIC SEQUENCE, AND THEN SEND AN INSTRUCTION TO THE HUMAN BODY'S CELLS THROUGH EITHER mRNA OR A VIRAL-VECTOR TO SELF-PRODUCE THE DEADLY SPIKE PROTEIN OF COVID-19.

94. IN ONE REPORT, THE WALL STREET JOURNAL COMPARED THE CLINICAL TRIALS IN THE U.S. WITH THE U.K. TRIALS IN WHICH RESEARCHERS DELIBERATELY INFECTED 30 VOLUNTEERS WITH THE VIRUS THAT CAUSES COVID-19.

95. DURING AND FOLLOWING THE "VACCINATION" TRIALS, THERE WERE SIGNIFICANT INCREASES IN COVID INFECTIONS, ESPECIALLY NEAR THE END OF OCTOBER 2020 UNTIL JANUARY 2021.



96. IT IS INDISPUTABLE THAT THE SIGNIFICANT RISE IN COVID-19 INFECTIONS IN MID-TO-LATE 2020 COINCIDED WITH THE COVID-19 "VACCINE" TRIALS BEING CONDUCTED IN THE U.S. BY ALL THE "VACCINE" MAKERS UNDER OPERATION WARP SPEED, AKA MANHATTAN PROJECT 2.

### O. EUA "VACCINES", LEADING TO MUTATIONS AND VARIANTS

97. THREE "VACCINES" WERE GRANTED EMERGENCY USE AUTHORIZATION (EUA) IN THE UNITED STATES UNDER 21 USC, SECTION 360bbb-3 BY MODERNA, PFIZER, INC. AND JOHNSON AND JOHNSON.

98. IT IS CLEAR FROM THE LANGUAGE OF SUBSECTION (b) OF 360bbb-3, ENTITLED "DECLARATION OF EMERGENCY OR THREAT JUSTIFYING EMERGENCY AUTHORIZED USE", THAT ACTS OF BIOLOGICAL WARFARE ARE THE PRIMARY CONSIDERATION OF THE ACT. THE ACT STATES, IN RELEVANT PART:

(1) IN GENERAL. THE SECRETARY MAY MAKE A DECLARATION THAT THE CIRCUMSTANCES EXIST JUSTIFYING THE AUTHORIZATION UNDER THIS SUBSECTION FOR A PRODUCT ON THE BASIS OF -

(A) A DETERMINATION BY THE SECRETARY OF HOMELAND SECURITY THAT THERE IS A DOMESTIC EMERGENCY, OR A SIGNIFICANT POTENTIAL FOR A DOMESTIC EMERGENCY, INVOLVING A HEIGHTENED RISK OF ATTACK WITH A BIOLOGICAL, CHEMICAL, RADIOLOGICAL, OR NUCLEAR AGENT OR AGENTS;

(B) A DETERMINATION BY THE SECRETARY OF DEFENSE THAT THERE IS A MILITARY EMERGENCY, OR A SIGNIFICANT POTENTIAL FOR A MILITARY EMERGENCY, INVOLVING A HEIGHTENED RISK TO UNITED STATES MILITARY FORCES, INCLUDING PERSONNEL OPERATING UNDER THE AUTHORITY OF TITLE 10 OR TITLE 50, UNITED STATES CODE, OF ATTACK WITH -

(i) A BIOLOGICAL, CHEMICAL, RADIOLOGICAL, OR NUCLEAR AGENT OR AGENTS; OR

(ii) AN AGENT OR AGENTS THAT MAY CAUSE, OR ARE OTHERWISE ASSOCIATED WITH, AN IMMEDIATELY LIFE-THREATENING AND SPECIFIC RISK TO UNITED STATES MILITARY FORCES;

(C) A DETERMINATION BY THE SECRETARY THAT THERE IS A PUBLIC HEALTH EMERGENCY, OR A SIGNIFICANT POTENTIAL TO AFFECT, NATIONAL SECURITY OR THE HEALTH

AND SECURITY OF UNITED STATES CITIZENS LIVING ABROAD,  
AND THAT INVOLVES A BIOLOGICAL, CHEMICAL, RADIO-  
LOGICAL, OR NUCLEAR AGENT OR AGENTS, OR A DISEASE  
OR CONDITION THAT MAY BE ATTRIBUTABLE TO SUCH  
AGENT OR AGENTS; OR

(D) THE IDENTIFICATION OF A MATERIAL THREAT PURSUANT  
TO SECTION 319F-2 OF THE PUBLIC HEALTH SERVICE  
ACT ... SUFFICIENT TO AFFECT NATIONAL SECURITY OR  
THE HEALTH AND SECURITY OF UNITED STATES CITIZENS  
LIVING ABROAD.

99. AS SOON AS COVID-19 "VACCINES" - WHICH USE THE  
BWMO'S SPIKE PROTEIN - BEGAN TO BE ADMINISTERED UNDER  
EUA VIA MANHATTAN PROJECT 2, SARS-COV-2 BEGAN TO  
MUTATE, THEREBY CAUSING VARIANTS TO THE VIRUS.

100. THE WORLD HEALTH ORGANIZATION (THE WHO) HAS  
ASSIGNED LETTERS OF THE GREEK ALPHABET TO KEEP TRACK OF  
THE VARIANTS AND INCLUDE, BUT ARE NOT LIMITED TO, ALPHA  
(B.1.1.7 OF THE U.K.), BETA (B. 1.351 OF SOUTH AFRICA),  
DELTA (B. 1.617.2 OF INDIA), GAMMA (P.1 OF BRAZIL),  
IOTA, LAMBDA (OF PERU), MU AND OMICRON (B.1.1.529  
OF SOUTH AFRICA).

101. "VACCINE" MAKERS USE SPIKE PROTEINS FROM THE CORONAVIRUS VARIANTS TO PRODUCE EACH AMPLIFIED "VACCINE". THE GENETIC INSTRUCTION FROM THE AMPLIFIED "VACCINE" CAUSES THE RECIPIENT'S CELLS TO SELF-PRODUCE AMPLIFIED SPIKE-PROTEINS.

102. LOCATIONS OF KEY MUTATIONS ON THE VARIOUS VARIANTS' SPIKE PROTEIN, INCLUDE, BUT ARE NOT LIMITED TO THE FOLLOWING:

- **P681R**: PRODUCES HIGHER VIRAL LOADS IN PEOPLE; CAUSES 1,000 TIMES MORE VIRUS IN THE RESPIRATORY TRACT. IS FOUND AT THE BEGINNING OF A PART OF THE GENOME CALLED THE FURIN CLEAVAGE SITE. FURIN IS USED TO SLICE THE SPIKE PROTEIN INTO THE OPTIMAL SHAPE FOR ENTERING THE CELL. THIS MUTATION MAKES SCULPTING MORE EFFICIENT.

- **D950N**: LOCATED OUTSIDE THE RECEPTOR-BINDING DOMAIN IN AN AREA OF THE CORONAVIRUS GENOME THAT HELPS THE VIRUS FUSE WITH HUMAN CELLS. FUSING WITH HUMAN CELLS ALLOWS THE CORONAVIRUS TO DUMP ITS GENETIC MATERIAL INTO THOSE CELLS. THIS MUTATION COULD AFFECT WHICH TYPE OF CELLS THE VIRUS INFECTS, POTENTIALLY ALLOWING IT TO HARM DIFFERENT ORGANS AND TISSUES. MUTATIONS IN THIS REGION ARE ASSOCIATED WITH HIGHER VIRAL LOADS.

• **D614G**: CALLED "DOUG"; INCREASES THE OPENNESS AND DENSITY OF SPIKE PROTEIN ON THE SURFACE OF VIRAL PARTICLES AND MAKES IT EASIER FOR THE VIRUS TO LATCH ONTO AND ENTER CELLS.

• **N501Y**: ENABLES SPIKES TO INVADE CELLS MORE SUCCESSFULLY THAN THE ORIGINAL VIRUS. THIS MUTATION CHANGED ONE AMINO ACID - A BUILDING BLOCK OF PROTEINS - IN THE RECEPTOR-BUILDING DOMAIN.

• **E484K**: CALLED "EEK"; ALLOWS THE VIRUS TO SPREAD EVEN AMONG UNVACCINATED PEOPLE.

• **T478K**: LOCATED AFTER THE PART OF THE SPIKE PROTEIN THAT BINDS TO ACE2 RECEPTORS ON RESPIRATORY CELLS, IT MAY ENHANCE INFECTIOUSNESS.

• **L45R**: HELPS VIRUS TO BIND TO CELLS AND AVOID RECOGNITION BY ANTIBODIES

103. OMICRON ITSELF HAS ABOUT 50 MUTATIONS, INCLUDING MORE THAN 30 THAT AFFECT ITS SIGNATURE SPIKE PROTEIN.

104. "VACCINE" MAKERS ARE NOW USING THE SPIKE PROTEIN FROM THE OMICRON VARIANT, WITH ITS 50 MUTATIONS, TO MAKE A NEW "VACCINE" WHICH WILL SEND A GENETIC INSTRUCTION



TO CAUSE A RECIPIENT'S CELLS TO SELF-PRODUCE SUCH SPIKE PROTEINS. (SEE ATTACHMENT 1).

## P. WEAPONIZING THE "VACCINATED" WITH THE BWMD

105. IN STATES THAT HIGHT "VACCINATION" RATES, PARTICULARLY IN THE NORTHEASTERN UNITED STATES, THERE WERE SIGNIFICANT RISES IN COVID-19 INFECTIONS.

106. FURTHERMORE, IN STATES THAT GENERALLY HAD LOW "VACCINATION" RATES, THERE WERE SIGNIFICANT INCREASES IN COVID-19 INFECTIONS AFTER "VACCINATION" AND "BOOSTER" CAMPAIGNS.

107. IN STATES THAT EXPERIENCED A HIGH "VACCINATION" RATE, SUCH WOULD BE FOLLOWED BY INCREASES OF INFECTION OF COVID-19 AMONG "UNVACCINATED" AND "VACCINATED" PEOPLE.

108. DESPITE THE HIGH NUMBER OF VACCINATIONS IN THE U.S., IT IS REPORTED THAT NEW COVID INFECTIONS WERE UP 316% BY THE END OF 2021 FROM 2020, WHEN THERE WERE NO APPROVED "VACCINES".

109. FOLLOWING THE "VACCINATION" DRIVES AND "BOOSTER" CAMPAIGNS OF THE SUMMER OF 2021, IT IS REPORTED THAT SEPTEMBER WAS THE 3RD DEADLIEST MONTH IN 2021.

110. IT IS REPORTED THAT, DESPITE THE HIGH RATE OF "VACCINATIONS" IN THE U.S., CORONAVIRUS DEATHS WERE AND ARE INCREASING.

### Q. OTHER DANGERS ASSOCIATED WITH "VACCINES"

111. CONTRARY TO "VACCINE"-PROMOTERS' BLANKET ASSERTIONS THAT COVID "VACCINES" ARE "SAFE AND EFFECTIVE," THERE ARE MANY REAL-LIFE RISKS AND DANGERS ASSOCIATED WITH THE BLIND COVID-19 "VACCINES", AND VAERS, THE VACCINE ADVERSE EVENT REPORTING SYSTEM, WHICH IS ADMINISTERED BY THE CENTERS FOR DISEASE CONTROL AND PREVENTION (CDC) AND THE FDA HAS NOTED SEVERAL, INCLUDING, BUT NOT LIMITED TO:

- i) LOW PLATELETS (THROMBOCYTOPENIA);
- ii) NON-INFECTIOUS MYOCARDITIS - OR HEART INFLAMMATION;
- iii) MULTISYSTEM INFLAMMATORY SYNDROME IN CHILDREN, OR MIS-C, SEVERELY INFLAMMING ORGANS AND TISSUES;
- iv) DEEP-VEIN THROMBOSIS;
- v) CEREBRAL VENOUS SINUS THROMBOSIS -
- vi) BINDING TO PF4 COMPLEXES, WHICH COULD TRICK THE IMMUNE SYSTEM, TRIGGERING AN ARCHAIC DEFENSE MECHANISM CAUSING IT TO RUN OUT OF

CONTROL LEADING TO CLOTTING AND BLEEDING;  
vii) GULLIAN - BARRÉ SYNDROME, WHICH IS A  
NEUROLOGICAL DISORDER IN WHICH THE IMMUNE  
SYSTEM ATTACKS NERVES, CAUSING TEMPORARY  
BUT POTENTIALLY SEVERE PARALYSIS; AND  
viii) DEATHS - EITHER DUE TO THE "VACCINE" OR  
AFTER "VACCINATION": AS OF AUGUST 6, 2021  
THERE WERE 6,340 DEATHS CAUSED BY THE  
"VACCINE", AND AS OF JULY 26, 2021 THERE  
WERE 6,587 "VACCINATED" PEOPLE WHO DIED  
AFTER A SO-CALLED "BREAKTHROUGH  
INFECTION."

#### R. STATE-SPONSORED MUNCHAUSEN SYNDROME BY PROXY

112. THE CAUSING OF COVID-19 INFECTION OR SPREAD IN  
ANY WAY IS A CLEAR CASE OF STATE-SPONSORED MUNCHAUSEN  
SYNDROME BY PROXY.

113. AS STATED ABOVE, THE SO-CALLED "VACCINES" MADE BY  
THE NIH, MODERNA, BIOINTECH, PFIZER AND JOHNSON &  
JOHNSON, CONTAIN EXTRAPOLATED GENES FROM THE DEADLY  
SPIKE PROTEINS OF THE AMPLIFIED CORONAVIRUS; FROM THE  
AMPLIFIED SPIKE PROTEIN, A GENETIC INSTRUCTION IS SENT  
TO THE BODY'S CELLS VIA THE "VACCINE" TO CAUSE THE CELLS  
TO SELF-PRODUCE THE DEADLY SPIKE PROTEINS OF COVID-19.

NOTE: NO "OFF-SWITCH" IS DESCRIBED; SELF-PRODUCTION TO WHAT END? OVERWHELMING THE SYSTEM AND SHEPHERDING TO OTHERS?

114. SIMULTANEOUSLY, AS GOVERNMENT AND PUBLIC-HEALTH OFFICIALS WERE RECEIVING REPORTS ON THE RISE AND SPREAD OF THE ALPHA AND DELTA VARIANTS — WHICH WERE BOTH DESCRIBED AS RAPIDLY TRANSMITTING AND ABLE TO EVADE THE SO-CALLED "VACCINES", EVEN MORE INFECTIOUS AND DEADLY THAN THE ORIGINAL SARS-COV-2 STRAIN, OFFICIALS WERE ALSO TELLING THE SO-CALLED "VACCINATED" TO STOP WEARING MASKS, TRAVEL, AND CO-MINGLING.

115. WHAT RESULTED WAS AN EXPLOSIVE INCREASE IN COVID-19 INFECTIONS AND DEATHS.

116. MOREOVER, THE REPORTS CLEARLY DEMONSTRATED THAT COVID INFECTION AND SPREAD WAS JUST AS HIGH AMONG THE "VACCINATED" AS IT WAS AMONG THE "UNVACCINATED", AND IN SOME INSTANCES EVEN HIGHER.

117. FURTHERMORE, REPORTS SHOWED THAT COVID-19 INFECTION AND SPREAD WAS SHARPLY INCREASING IN AREAS THAT HAD JUST RECENTLY HAD AN INCREASE IN COVID "VACCINATIONS", OR IN AREAS THAT WERE HEAVILY "VACCINATED". THIS IS CLEARLY STATE-SPONSORED MUNCHHAUSEN SYNDROME BY PROXY.

## 5. HISTORY OF U.S. MUNCHAUSEN SYNDROME BY PROXY

118. THE CURRENT BLIND OF COVID-19 BEING UNLEASHED ON THE PEOPLE OF THE UNITED STATES IS FAR FROM BEING THE FIRST INCIDENCE OF STATE-SPONSORED MUNCHAUSEN SYNDROME BY PROXY IN THE U.S. THE UNITED STATES HAS A HISTORY OF VICTIMIZING ITS CITIZENS - OF ALL RACES - UNDER THE GUISE OF MEDICAL RESEARCH AND DEVELOPMENT, AND SUCH HISTORY OF PURPOSEFUL BIOLOGICAL WARFARE AGAINST THE PEOPLE OF THE UNITED STATES HAS CAUSED MANY TO BE SKEPTICAL OF TODAY'S GOVERNMENTAL EFFORTS TO "VACCINATE" THE PUBLIC.

119. OTHER INCIDENTS INCLUDE, BUT ARE NOT LIMITED TO:

- i) THE SO-CALLED "TUSKEGEE EXPERIMENT," IN WHICH THE GOVERNMENT INFECTED MEN WITH SYPHILIS, LEFT MEN INFECTED WITH SYPHILIS UNTREATED WHILE PRETENDING TO TREAT THEM, AND LEAVING THEM TO INFECT OTHERS WITH SYPHILIS; THIS "EXPERIMENT" RAN FOR 40 YEARS ON THE UNSUSPECTING PUBLIC;
- ii) THE SO-CALLED "CUTLER INCIDENT," IN WHICH MORE THAN 200,000 AMERICAN CHILDREN RECEIVED A POLIO VACCINE IN WHICH THE PROCESS OF INACTIVATING THE LIVE VIRUS WAS DEFECTIVE. THE VACCINE, MANUFACTURED BY CUTLER LABORATORIES, EVENTUALLY CAUSED 40,000 CASES OF POLIO, LEAVING



200 CHILDREN WITH VARYING DEGREES OF PARALYSIS AND KILLING 10;

iii) STERILIZATION PROJECTS CONDUCTED ON CAUCASIAN WOMEN, SUCH AS THAT DESCRIBED BY ELIZABETH CATTE IN PURE AMERICA: EUGENICS AND THE MAKING OF MODERN VIRGINIA. "THE TERM 'EUGENICS' WAS COINED BY FRANCIS GALTON, A COUSIN OF CHARLES DARWIN, IN 1883. THE IDEA THAT A HOST OF SOCIETAL ILLS COULD BE TRACED TO BAD GENES GAINED WIDESPREAD ACCEPTANCE IN THE UNITED STATES IN THE DECADES TO COME, WITH THEODORE ROOSEVELT, ALEXANDER GRAHAM BELL AND PLANNED PARENTHOOD FOUNDER MARGARET SANGER AMONG THOSE WHO EMBRACED ITS PRINCIPLES TO VARYING DEGREES;

iv) "EUGENICS GAVE A SCHOLARLY VENEER TO RACIST AND SEXIST PSEUDOSCIENCE WHOSE AIM WAS TO PREVENT THOSE CONSIDERED TO BE OF POOR HEREDITARY STOCK FROM REPRODUCING. COURSES IN EUGENICS WERE COMMON AT AMERICAN UNIVERSITIES IN THE EARLY 20TH CENTURY, INCLUDING AT THE UNIVERSITY OF VIRGINIA (UVA);

v) "COMPULSORY STERILIZATION WAS LEGALIZED IN THE STATE IN 1924 AND UPHOLD BY THE SUPREME COURT IN BUCK V. BELL THREE YEARS LATER; APPROXIMATELY 60,000 PEOPLE WERE STERILIZED IN AMERICA OVER THE NEXT FOUR DECADES;

- vi.) "THE GENERAL TARGETS WERE THE 'PEOPLE MINOR', DEFINED IN VIRGINIA AS 'PERMANENTLY AND EXPENSIVELY ANTI-SOCIAL'. MANY OF THOSE INVOLUNTARILY COMMITTED WERE SIMPLY INDIGENT, SEEN AS A DRAIN ON RESOURCES AND MADE TO SUBMIT TO SPURIOUS CLINICAL ASSESSMENTS;"
- vii.) "POOR WHITE WOMEN WERE A PARTICULAR SOURCE OF EUGENIC ANXIETY TO SEGREGATIONISTS BECAUSE OF THE POSSIBILITY THAT THEY MIGHT GIVE BIRTH TO BIRACIAL CHILDREN."
- viii.) THE PROGRAM RUN BY THE U.S. ARMY CHEMICAL AND BIOLOGICAL WARFARE DEPARTMENT AT FORT DETRICK, MARYLAND, THAT IS ALLEGED TO HAVE MADE "A. I. D. S." (ACQUIRED IMMUNE DEFICIENCY SYNDROME) IN RESPONSE TO THE "RACE RIOTS" OF THE 1960'S; THE PROGRAM WAS CALLED "GREEN MONKEY." THE CHINESE HAVE EVEN SUGGESTED THAT THE CURRENT COVID-19 PANDEMIC, WHICH CONTINUES LARGELY UNCHECKED IN THE UNITED STATES, IS MORE LIKELY COMING FROM FORT DETRICK, MARYLAND IN SOME WAY;
- ix.) OTHER LARGE SCALE INSTANCES, SUCH AS THOSE DESCRIBED BY HARRIET A. WASHINGTON, AUTHOR OF "MEDICAL APARTHEID: THE DARK HISTORY OF MEDICAL EXPERIMENTATION ON BLACK AMERICANS FROM COLONIAL TIMES TO THE PRESENT," AS WELL AS

x) HIV "VACCINE", DEVELOPED IN 2004 BY MERCK & CO., WORKING WITH NIAID AND DR. FRUCI, WHICH PROGRAM WAS HALTED IN 2007 AFTER IT WAS DISCOVERED THAT ADENOVIRUS S (Ad5) VIRAL-VECTOR, AS USED NOW BY U\*U, WAS LIKELY MAKING MEN MORE SUSCEPTIBLE TO HIV.

120. BIOLOGICAL WARFARE IS NOT THE ONLY CONCERN, BUT ALSO THE FAST AND RUSHED INTRODUCTION INTO THE INDUSTRY OF FINITE MINDED MEN MAKING LONG-LASTING, INHERITABLE AND GENERATIONAL CHANGES USING THE SAME BIOTECHNOLOGY, "DESIGNER BABIES," ALSO MERGING HUMAN AND ANIMAL DNA IN THIS CHIMERIC-BASED SCIENCE, THE USE OF ABORTED BABY FETUS CELLS AND PARTS FOR RESEARCH OR INJECTION, INJECTING SO-CALLED "BLACKS" WITH "CAUCASIAN" BABIES OR SO-CALLED "WHITES" WITH "NEGRO" BLOOD AND CELLS (OR WHAT-EVER YOU CALL IT).

121. SOME MAY EVEN HAVE OBJECTION BASED ON THE "ONE-DROP-OF-BLOOD" RULE. (SEE NO PARTIALITY: THE IDEOLOGY OF RACE & THE NEW HUMANITY, BY DOUGLAS R. SHARP, INTER VARSITY PRESS (2002) pg. 117-122 (A "WHITE" SOCIO-STATUS DISQUALIFIER).

122. THE PEOPLE IN THE UNITED STATES OBJECTING TO ANY MANDATES TO TAKE SIBOTS ARE ACROSS THE SPECTRUM OF "RACES," STATUSES, AND PROFESSIONS, INCLUDING BUT NOT LIMITED TO HEALTH-CARE WORKERS, POLICE OFFICERS, AND CORRECTIONS OFFICERS AND OFFICIALS, EVEN IN D.C., MARYLAND AND VIRGINIA.

II. NATURAL IMMUNITY IS SUPERIOR IN STRENGTH WHEN FIGHTING AGAINST THE BIOLOGICAL WEAPON OF MASS DESTRUCTION COVID-19 AND THE BLIND "VACCINES" WOULD ONLY UNDERMINE THE SUPERIOR PROTECTION GAINED BY NATURAL IMMUNITY.

A. IT IS NOT MERELY "VACCINATED" VS. "UNVACCINATED"

123. WHILE PUBLIC-HEALTH/GOVERNMENT OFFICIALS AND "VACCINE" COMPANIES PRESENT THE ISSUE AS A COMPARISON BETWEEN THE "VACCINATED" AND THE "UNVACCINATED", THERE ARE ADDITIONAL ISSUES THAT MUST BE CONSIDERED, INCLUDING BUT NOT LIMITED TO:

- i) THE "UNVACCINATED" WHO HAVE NOT HAD COVID;
- ii) THE "UNVACCINATED" WHO HAVE HAD COVID AND NOW HAVE NATURAL IMMUNITY;
- iii) AGE;
- iv) COMORBIDITIES + IMMUNOCOMPROMISED; AND
- v) TYPE AND BRAND OF "VACCINE" TAKEN OR AVAILABLE.

124. WHEN IT COMES TO COVID-19 INFECTION, THERE ARE TWO-TYPES OF IMMUNITY: INTERNAL IMMUNITY AND MUCOSAL IMMUNITY.

125. INTERNAL IMMUNITY PROTECTS THE INSIDE OF THE BODY, INCLUDING THE LUNGS. THIS OCCURS BY RELEASE OF ANTIBODIES OF THE IMMUNOGLOBULIN G TYPE, OR IgG, INTO THE BLOOD AND PRODUCTION OF T-CELLS.

126. MUCOSAL IMMUNITY PROVIDES THE FIRST LINE OF DEFENSE BY PROTECTING THE NOSE AND MOUTH, AND BY DOING SO ALSO REDUCES SPREAD TO OTHERS. THE MUCOUS MEMBRANES SECRETE A PARTICULAR FORM OF ANTIBODIES OF IMMUNOGLOBULIN A TYPE, OR IgA.

127. A VACCINATED PERSON WHO IS INFECTED WITH COVID DOES NOT DEVELOP MUCOSAL IMMUNITY AND THEREFORE CAN CONTRACT AND SPREAD COVID TO OTHERS, EVEN IF THE VACCINATED - INFECTED PERSON IS ASYMPTOMATIC.

128. MOREOVER, ACCORDING TO THE CDC, SAMPLES SHOWED THAT THE AMOUNT OF VIRUS INFECTED PEOPLE CARRIED - OR VIRAL LOAD - WAS SIMILAR BETWEEN VACCINATED AND UNVACCINATED PATIENTS. THE CDC CONCLUDED THAT VACCINATED PEOPLE WHO BECAME INFECTED MIGHT SPREAD THE DELTA VARIANT AS READILY AS THE UNVACCINATED.

129. RECENT REPORTS FROM THE CDC HAVE STATED THAT NATURAL IMMUNITY WAS SUPERIOR TO VACCINATED IMMUNITY WHEN IT CAME TO DELTA.



130. RESEARCHERS FOUND THAT PEOPLE WHO HAVE BEEN INFECTED WITH COVID AND WERE NOT "VACCINATED" DEVELOPED BOTH INTERNAL AND MUCOSAL IMMUNITY, WHILE THE "VACCINATED" ONLY DEVELOPED INTERNAL IMMUNITY.

131. FURTHERMORE, SCIENTISTS HAVE DETECTED AND EXAMINED ANTIBODIES IN PEOPLE PREVIOUSLY INFECTED WITH COVID-19 AT ALL PERIODS THUSFAR, 10 MONTHS, 11 MONTHS, 12 MONTHS, 16 MONTHS AFTER INFECTION, THUS LEADING SOME SCIENTISTS TO BELIEVE THAT, AS WITH OTHER CORONAVIRUS INFECTIONS, ANTIBODIES FROM NATURAL INFECTION MAY LAST FOR LIFE.

132. SCIENTISTS HAVE FOUND THAT B CELLS AND T CELLS (OR SO-CALLED "MEMORY CELLS") ARE EVER PRESENT IN PEOPLE PREVIOUSLY INFECTED WITH COVID-19, WHICH RECOGNIZE AND ATTACK ANY FUTURE INFECTION OF COVID-19, AUTOMATICALLY MAKING ADJUSTMENTS FOR VARIANTS AND THEIR MUTATIONS.

133. SCIENTISTS HAVE FOUND THAT LESS THAN 1% OF ALL PEOPLE PREVIOUSLY INFECTED WITH COVID WILL EVER BE RE-INFECTED.

134. WHILE THOSE WITH NATURAL IMMUNITY AS A RESULT OF PREVIOUS INFECTION DEVELOP BOTH INTERNAL IMMUNITY AND MUCOSAL IMMUNITY, THOSE WHOSE IMMUNITY WAS INDUCED BY "VACCINATION" DO NOT DEVELOP MUCOSAL IMMUNITY.

IT IS REPORTED THAT THIS IS WHY THE "VACCINATED" STILL CONTRACT AND SPREAD COVID TO OTHERS.

135. ACCORDINGLY, IT IS ACTUALLY THE "VACCINATED" WHO PRESENT THE RISK OF SPREAD AND INFECTION AND NOT THOSE WITH NATURAL IMMUNITY.

136. IN A SAMPLE OF MORE THAN 700,000 PEOPLE, NATURAL IMMUNITY WAS 27 TIMES MORE EFFECTIVE THAN VACCINATED IMMUNITY IN PREVENTING SYMPTOMATIC INFECTIONS.

### B. "EFFICACY" AND "EFFECTIVENESS"; QUESTIONABLE

137. AS COVID CONTINUES TO BE AMPLIFIED FROM THE ORIGINAL SARS-COV-2 STRAIN, THE "VACCINES" SO-CALLED "EFFICACY" AND "EFFECTIVENESS" (WHICH ARE NOT THE SAME THING) ARE INCREASINGLY BEING CALLED INTO QUESTION BY RESEARCHERS, SCIENTISTS AND "VACCINE" MAKERS, PARTICULARLY DUE TO THE RISING NUMBER OF SO-CALLED "BREAKTHROUGH INFECTIONS."

### C. BOOSTER SHOTS AND ANTIBODY LEVELS

138. FURTHERMORE, THE CURRENT PUSH FOR BOOSTER SHOTS BASED ON AN ASSESSMENT OF A GENERAL LEVEL OF ANTIBODIES

HAS BEEN PROVEN TO BE IMPROPER.

139. PEOPLE WOULD LIKE TO KNOW WHETHER THEIR COVID-19 VACCINE IS PROTECTIVE ENOUGH OR A PREVIOUS INFECTION WILL KEEP THEM SAFE. EXPERTS WARNED THAT TAKING AN ANTIBODY TEST ISN'T A GOOD WAY TO FIND OUT. THE TESTS WERE DESIGNED TO SHOW WHETHER SOMEONE WAS RECENTLY INFECTED WITH THE CORONAVIRUS NOT WHETHER THEY HAVE ENOUGH IMMUNE SOLDIERS TO PREVENT INFECTION. THE LEVEL OF ANTIBODIES NEEDED TO PROVIDE PROTECTION ISN'T KNOWN.

140. ANTIBODY TESTS WERE NEVER DEVELOPED AND DESIGNED TO DETECT OR TELL US ANYTHING ABOUT VACCINE-INDUCED PROTECTIVE IMMUNITY. A TEST THAT YIELDS NO SPIKE PROTEIN ANTIBODIES DOESN'T NECESSARILY MEAN A PERSON IS UNPROTECTED FROM THE VIRUS. EVEN THOUGH THERE AREN'T ANY DETECTABLE [ANTIBODIES] AT THE MOMENT OF TESTING, THE BODY CAN QUICKLY PRODUCE THEM AGAIN IF IT ENCOUNTERS THE VIRUS.

141. WITH ANY VACCINE, THE RESPONSE YOU MEASURE IN THE BLOOD IS GOING TO DECREASE OVER TIME AFTER VACCINATION BECAUSE THE BODY ISN'T BEING CONSTANTLY EXPOSED TO THE FOREIGN PROTEIN. BUT IF THEY ENCOUNTER THE VIRUS, THE BODY CAN VERY RAPIDLY HAVE A RECALL, OR A MEMORY RESPONSE THAT IS ABLE TO BASICALLY RUSH TO THE SCENE OF INFECTION AND CONTAIN IT.

142. EVEN IF ALL COMMERCIAL TESTS WERE ABLE TO DETECT NEUTRALIZING ANTIBODIES FROM COVID-19 VACCINES, HEALTH EXPERTS SAID, IMMUNITY WOULD NOT BE GUARANTEED AS IT'S UNCLEAR WHAT LEVELS ARE NEEDED TO ENSURE PROTECTION. THE HIGHER THE NUMBER, THE MORE ANTIBODIES YOU HAVE. BUT WHAT NUMBER IS CLINICALLY SIGNIFICANT AND ASSOCIATED WITH PROTECTION? WE CAN'T SAY YET. MEASURING ANTIBODIES CAPTURES ONLY ONE PART OF THE IMMUNE SYSTEM.

143. SO IT WOULD BE A MISTAKE FOR SOMEONE TO MEASURE AN ANTIBODY RESPONSE FIVE OR SIX MONTHS AFTER THE VACCINE AS NOT HAVING IMMUNITY BECAUSE YOUR T-CELL RESPONSE IS GOING TO PEAK AT THAT TIME, AND IT'S GOING TO BE MORE ROBUST IN GENERATING IMMUNITY. YOU TRACK ANTIBODY DECLINE OVER TIME, AND IF YOU KNOW THE THRESHOLD OF PROTECTION, YOU CAN CALCULATE DURABILITY OF PROTECTION. WITH COVID, WE DON'T KNOW.

#### D. "VACCINES" ARE CONTRIBUTING TO INFECTION RATE

144. DESPITE CAMPAIGNS OF DOUBLE - "VACCINATIONS" AND THIRD-SHOT BOOSTERS, AFTER THE LEVELING OFF OF DEATHS FOLLOWING A SURGE IN COVID-19 INFECTIONS FROM THE DELTA VARIANT, THERE IS NOW A RISE IN NEW INFECTIONS FROM A VARIANT CALLED Omicron (B.1.1.529) AND Omicron "STEALTH", WHICH BOTH HAVE ABOUT 50 MUTATIONS, INCLUDING

MORE THAN 30 THAT AFFECT ITS SIGNATURE SPIKE PROTEIN, THE STRUCTURE THAT HELPS THE VIRUS INFILTRATE CELLS. INFECTION WITH OMICRON IS HEAVIEST IN AREAS WITH THE HIGHEST RATES OF "VACCINATIONS" AND "BOOSTERS," SUCH AS THE U.S. - PARTICULARLY IN THE NORTHEASTERN REGION, AND IN EUROPE - PARTICULARLY IN THE U.K.

145. SCIENTISTS AND RESEARCHERS HAVE REPORTED THAT, NOT ONLY IS THERE NO EVIDENCE THAT "VACCINES" BENEFIT IN ANY WAY THOSE WHO HAVE NATURAL IMMUNITY, BUT THERE IS EVIDENCE THAT "VACCINES" AFTER INFECTION ACTUALLY UNDERMINE NATURAL IMMUNITY.



III. FROM CHINA'S WUHAN INSTITUTE OF VIROLOGY (WIV) TO COFFEEWOOD CORRECTIONAL CENTER (CWCC) OF THE VIRGINIA DEPARTMENT OF CORRECTIONS (VDOC); DEFENDANTS CAUSED PLAINTIFF TO BECOME INFECTED WITH THE BIOLOGICAL WEAPON OF MASS DESTRUCTION COVID-19.

146. BEGINNING ON MARCH 12, 2020, DEFENDANT HAROLD CLARKE, DIRECTOR OF THE VDOC, PLACED THE VDOC ON LOCKDOWN STATUS IN RESPONSE TO DEFENDANT RALPH NORTHAM - GOVERNOR OF VIRGINIA - DECLARATION OF A STATE OF EMERGENCY IN THE COMMONWEALTH OF VIRGINIA DUE TO THE GENERAL NEWS OF THE COVID-19 VIRUS.

147. PLAINTIFF AND OTHER PRISONERS COMPLIED WITH ALL MANDATES TO ENSURE THAT CWCC REMAINED CORONAVIRUS FREE.

148. MOREOVER, SINCE 2018, PLAINTIFF HAD BEEN WORKING IN THE LAW LIBRARY AS A LAW LIBRARY CLERK, EVEN AT ALL TIMES DURING THE PANDEMIC AND SHUTDOWN IN VDOC/CWCC.

149. PLAINTIFF WORKED VERY HARD TO ENSURE VDOC/CWCC OFFICIALS THAT THE LAW LIBRARY REMAIN A COVID-FREE ZONE AND THAT ANY AND ALL SANITARY AND SAFETY PROCEDURES WOULD BE FOLLOWED SO AS NOT TO SPREAD COVID AT CWCC.

COVID WAS NEVER SPREAD AT OR FROM THE LAW LIBRARY AT ANY TIME

dURING THIS "PANDEMIC".

150. PLAINTIFF REPEATEDLY COMPLAINED, HOWEVER, ABOUT VDOC/CWCC OFFICIALS' CONDUCT ON THE COMPOUND AS SUCH CONDUCT WAS LIKELY TO CAUSE TRANSMISSION OF COVID-19 FROM SOCIETY INTO THE PRISON, OR FROM PRISON-TO-PRISON, BUILDING-TO-BUILDING, ETC.

151. IN LATE 2020, VDOC/CWCC OFFICIALS OFFERED- WITH INCENTIVE FOR THE FIRST TIME - A "FLU SHOT." AFTER THE ADMINISTRATION OF THIS "FLU SHOT." UPON OTHER PRISONERS, AS WELL AS THE MINGLING OF COVID-19 INFECTED STAFF AND PRISONERS, PLAINTIFF BECAME INFECTED WITH COVID-19.

152. AFTER PLAINTIFF'S COVID-19 INFECTION AND RECOVERY, PLAINTIFF HAD SEVERAL MEDICAL APPOINTMENTS, AT CWCC AND AT OUTSIDE MEDICAL FACILITIES, AT WHICH TIMES DOCTORS EXPLAINED TO PLAINTIFF THAT HE HAD NATURAL IMMUNITY TO COVID-19. PLAINTIFF SUBSEQUENTLY CONDUCTED AN EXTENSIVE RESEARCH PROJECT AS TO NATURAL IMMUNITY TO COVID-19.

153. PLAINTIFF HAD CONTINUED TO WORK IN THE LAW LIBRARY AS A CLERK. SINCE TESTING POSITIVE IN LATE 2020, PLAINTIFF HAS TESTED OFTEN FOR COVID AND PLAINTIFF HAS NEVER AGAIN TESTED POSITIVE, ALTHOUGH NEARLY ALL VACCINATED PRISONERS AROUND HIM HAVE TESTED POSITIVE.

III. DEFENDANTS HAVE ORCHESTRATED A CAMPAIGN OF MANDATES AND PUNISHMENTS TO FORCE INJECTION OF BLIND "VACCINES" UNDER THREAT, DURESS AND COERSION AND ARE ACTIVELY ENGAGED IN STATE-SPONSORED MUNCHAUSEN SYNDROME BY PROXY TO PERPETUATE THE COVID-19 "PANDEMIC" AND SITUATION.

154. DATED DECEMBER 2020, THE VDOC AND CWCCE OFFICIALS PUBLISHED A "FACT SHEET" CONCERNING THE COVID-19 "VACCINE" BEING "OFFERED" IN THE VDOC.

155. THE SO-CALLED "FACT SHEET" EXPLAINED THAT i) THE MODERNA COVID VACCINE IS AUTHORIZED ONLY UNDER AN EMERGENCY USE AUTHORIZATION (EUA); ii) IT IS "UNAPPROVED"; iii) THE VACCINE MAY NOT PROTECT EVERYONE; iv) THIS TYPE OF CORONAVIRUS HAS NOT BEEN SEEN BEFORE; v) YOU SHOULD NOT GET THE VACCINE IF YOU'VE EVER HAD AN ALLERGIC REACTION TO THE INGREDIENTS IN THE VACCINE (WHICH THEY'VE NEVER PUBLISHED); vi) THERE ARE SIDE-EFFECTS; vii) IT COULD CAUSE A SEVERE ALLERGIC REACTION; viii) THE SIDE EFFECTS PUBLISHED IN THE PAPER MAY NOT BE ALL THE POSSIBLE SIDE EFFECTS; ix) THERE MAY BE SERIOUS AND UNEXPECTED SIDE EFFECTS; x) THE VACCINE IS STILL BEING STUDIED IN CLINICAL TRIALS; xi) IF YOU EXPERIENCE A SEVERE ALLERGIC REACTION, CALL 911, OR GO TO THE NEAREST HOSPITAL (WHICH IS NOT POSSIBLE IN THE PRISON AS A PRISONER).

156. AS STATED ABOVE, SINCE 2018, PLAINTIFF HAS BEEN WORKING AS A LAW LIBRARY CLERK IN THE PRISON'S LAW LIBRARY, EVEN AT ALL TIMES DURING THE PANDEMIC AND SHUTDOWN IN VDOC/CWCC. PLAINTIFF'S SUPERVISORS DURING THE PERIODS OF COVID WERE D. GOURDINE, INSTITUTIONAL PROGRAMS MANAGER (IPM), C. WALKER, CHIEF OF HOUSING AND PROGRAMS (CHAP), DENISE HILLMAN, HOUSING UNIT MANAGER (HUM), ASSISTANT WARDEN REBECCA YOUNG, WARDEN ROONEY YOUNG, AS WELL AS MR. LEWIS, RECREATIONS MANAGER, MS. McDOWELL, PROGRAMS SUPERVISOR, MS. HILL, HUM, MS. DENNIS, TREATMENT OFFICER, KENNEY BOWLES, THE CURRENT WARDEN OF CWCC, ALSO CHIEF OF SECURITY, MAJOR RUFFIN, AND THE SUBSEQUENT AND CURRENT CHIEF OF SECURITY, MAJOR MARTIN, WHOM ALSO SUPERVISE PRISONERS AT THE LAW LIBRARY.

157. AFTER THE ARRIVAL OF ASHLYN HARTBOOK, THE NEW IPM WHO REPLACED D. GOURDINE WHO HAD RETIRED IN EARLY 2021, IPM HARTBOOK SCHEDULED MEETINGS WITH THE LAW LIBRARY CLERKS TO EXPLAIN WHAT SHE STATED WERE DIRECTIVES BEING PASSED DOWN FROM DEFENDANTS HAROLD CLARKE AND RALPH NORTHAM, AS WELL AS FROM DR. ANTHONY FAUCLT, OF NIAID, THE CDC, THE VIRGINIA DEPARTMENT OF HEALTH (VDH), AND OTHERS - WHO WERE COLLECTIVELY CALLED "THE NEW NORMAL COMMITTEE."

158. A. HARTBOOK EXPLAINED THAT ACCORDING TO THE NEW DIRECTIVE OF "THE NEW NORMAL COMMITTEE" AND SPECIFICALLY DEFENDANT CLARKE, BEGINNING IN MID-JULY, 2021, ONLY PERSONS WHO HAVE BEEN FULLY VACCINATED WOULD BE ALLOWED TO ATTEND ANY PROGRAMS, SCHOOL, LAW LIBRARY, OR ANY OTHER SERVICES VDOC/CWCC HAD TO OFFER, SO LONG AS THEY LIVED IN A ROOM IN WHICH 75 % OF THE PEOPLE WERE VACCINATED. THIS RESTRICTION WOULD NOT APPLY TO RE-ENTRY PROGRAMS RUN BY THE STATE, IN WHICH PARTICIPANTS, BOTH "VACCINATED" AND "UNVACCINATED" ARE HOUSED TOGETHER, CHANT, SING SONGS, GIVE SPEECHES, GATHER AROUND, ETC.

159. PLAINTIFF EXPLAINED THAT, CONTRARY TO THE "DIRECTIVE," THERE IS ABSOLUTELY NO SEPARATION OF THE "VACCINATED" AND "UNVACCINATED" IN VDOC/CWCC, NOR IS IT EVEN POSSIBLE DUE TO THE CONFIGURATION OF THE PRISONS. BOTH "VACCINATED" AND "UNVACCINATED" ARE HOUSED TOGETHER, IN BUNK BEDS, WITH LESS THAN THREE FEET SPACE BETWEEN THEM, AND TABLES, MICROWAVES, RESTROOMS, SHOWERS, GAMES, SPORTS, GYMS, RECREATION AND EQUIPMENT, AND PHONES, ETC., ARE COMMONLY SHARED BY ALL IN THE PRISON COMMUNITY.

160. PLAINTIFF EXPLAINED THAT BOTH "VACCINATED" AND "UNVACCINATED" PRISONERS ARE MOVED FROM BUILDING-TO-BUILDING AND TRANSFERRED FROM PRISON-TO-PRISON.



161. PLAINTIFF EXPLAINED THAT HALF OF THE VDOC/CWCC STAFF IS NOT "VACCINATED".

162. PLAINTIFF EXPLAINED THAT, BEING THAT THE "VACCINATED" AND THE "UNVACCINATED" ARE NOT SEPARATED IN ANY OTHER SENSE, DENYING ACCESS TO THE "UNVACCINATED" TO THE LAW LIBRARY, RELIGIOUS SERVICES, PROGRAMS, ETC., IS MERELY PUNITIVE, DISCRIMINATORY, AND A VIOLATION OF DUE PROCESS AND EQUAL PROTECTION OF THE LAW.

163. PLAINTIFF ALSO EXPLAINED THAT THE "NEW NORMAL" PRINCIPLES MADE NO SENSE AND WERE UNTIMELY BEING THAT THE STATE OF EMERGENCY WAS ENDED IN VIRGINIA ON JUNE 30, 2021, AND EVERYONE HERE, INCLUDING MYSELF, ALREADY HAD COVID AND WERE THUS NATURALLY IMMUNE.

164. PLAINTIFF EXPLAINED THAT HE HAD SEVERAL MEDICAL VISITS SINCE HAVING COVID BACK IN NOVEMBER 2020, AND HE WAS TOLD BY THE DOCTOR THAT PLAINTIFF WAS NATURALLY IMMUNE TO COVID. PLAINTIFF EXPLAINED THAT NEVER HAS ANY MEDICAL STAFF OR DOCTOR EVER RECOMMENDED THAT PLAINTIFF GET A COVID-SHOT. PLAINTIFF EXPLAINED THAT THE ONLY PEOPLE WHO EVER RECOMMENDED AND MANDATED PLAINTIFF TO TAKE A COVID-SHOT WAS VDOC/CWCC STAFF AND OFFICIALS (WHO ARE NOT DOCTORS).

165. PLAINTIFF EXPLAINED THAT WHETHER OR NOT HE CHOSE TO GET A COVID-SHOT IS HIS PERSONAL BUSINESS AND SHOULD BE CONFIDENTIAL UNDER THE RULES OF THE FEDERAL HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA).

166. PLAINTIFF EXPLAINED THAT HE HAS HIS OWN HEALTH REASONS FOR NOT WANTING TO TAKE SUCH COVID-SHOT, AND THAT AFTER CONDUCTING RESEARCH INTO THE COVID "VACCINE" AND ANY ACTION TAKEN AGAINST HIM FOR NOT TAKING SUCH "VACCINE" THAT JEOPARDIZES HIS HEALTH, MORALS, PRINCIPLES, AND SINCERELY-HELD RELIGIOUS BELIEFS IS A CONTINUING VIOLATION OF CONSTITUTIONALLY PROTECTED RIGHTS AND FREEDOMS AS WELL AS A VIOLATION OF THE AMERICANS WITH DISABILITIES ACT (ADA), AND PLAINTIFF WOULD SUE.

167. IN RESPONSE, A. HARTBOOK STATED THAT NEITHER SHE NOR ANY OTHER STAFF/OFFICIAL AT CWCCE WOULD BE PROPER DEFENDANTS TO THE LAWSUIT BECAUSE SHE AND THEY WERE ONLY FOLLOWING CLEARLY EXPLAINED DIRECTIVES AND MANDATES FROM DEFENDANTS CLARKE AND NORTHAM. A. HARTBOOK STATED THAT SHE MEETS WITH THE "NEW NORMAL COMMITTEE" EVERY WEEK AND/OR HAS PHONE CONFERENCES OR RECEIVES EMAILS FROM THEM EXPLAINING WHAT TO DO.

168. PLAINTIFF ASKED A. HARTBOOK FOR A COPY OF SUCH DIRECTIVES OR ANYTHING IN WRITING FROM THE "NEW NORMAL"

COMMITTEE," AND SHE STATED THAT SHE COULD NOT DISCLOSE ANY INFORMATION TO PLAINTIFF, THE LAW LIBRARY, OR THE PRISON'S GENERAL POPULATION.

169. SOME OF THE MEETINGS WITH A. HARTSOOK WERE ATTENDED BY, WITH THE OTHER TWO LAW LIBRARY CLERKS, J. CRIDGEE-SMITH AND J. VILLAFANA.

170. AFTER SUCH MEETINGS, I BEGAN TO BE DENIED ACCESS TO THE LAW LIBRARY, RELIGIOUS SERVICES, PROGRAMS, AND OTHER SERVICES BECAUSE I WOULD NOT TAKE THE BLIND "VACCINE,"

WHILE THE "VACCINATED" PRISONERS WERE ALLOWED TO ATTEND. I EXPLAINED TO A. HARTSOOK THAT I WAS RESEARCHING AND PREPARING TO FILE BOTH A PETITION FOR WRIT OF HABEAS CORPUS AND A PETITION FOR PARDON, BUT SHE STATED WITHOUT A "VACCINE" I WOULD NOT BE ABLE TO ATTEND THE LAW LIBRARY.

171. IN A SERIES OF MEETINGS, DISCUSSIONS, LETTERS, ETC. I BEGAN TO COMPLAIN TO A. HARTSOOK'S SUPERVISORS, CHAT WALKER, ASSISTANT WARDEN ROANE, WARDEN BOWLES, AND REGIONAL OMBUDSMAN J. MOE-WILLIS, EXPLAINING ALL OF THE MATTERS AS DESCRIBED.

172. THEY EACH RESPONDED THAT NEITHER A. HARTSOOK NOR THEMSELVES WERE RESPONSIBLE OR THE PROPER PEOPLE TO

SHE BECAUSE THEY WERE ALL ONLY DOING AS DIRECTED BY DEFENDANTS CLARKE AND NORTHAM, AND THEY SUPPORTED A. HARTBOOK IN HER ACTIONS AND MEET WEEKLY TO ENSURE THAT SUCH ACTIONS ARE BEING IMPLEMENTED.

173. BEGINNING ON JULY 19, 2021, DEFENDANTS K. BOWLES, A. HARTBOOK AND CHAPLAIN MEYER, ISSUED A SERIES OF MEMOS DESCRIBING "THE NEW NORMAL" AS TO BE IMPLEMENTED AT CICC. IN EFFECT, THE MEMOS EXPLAINED THAT THE CONSTITUTIONAL LAWS OF THE UNITED STATES AND VIRGINIA, AS WELL AS ALL OF THE OPERATING PROCEDURES OF THE VDOC ARE SUSPENDED, SUPPRESSED, LIMITED, OVERRIDDEN, OR OTHERWISE MADE INEFFECTIVE AND INACCESSIBLE TO ANY PERSON HOUSED AT CICC IF THE VDOC IF THEY ARE NOT "FULLY VACCINATED" WITH A COVID-19 "VACCINE", AND IF THEY ARE NOT IN A DORM WHERE 75% OR MORE OF THE PEOPLE HOUSED IN THE DORM HAVE BEEN "FULLY VACCINATED". ADDITIONALLY:

i) LAW LIBRARY HOURS ARE DECREASED WHERE NIGHT TIME LAW LIBRARY IS CLOSED AND HOURLY ACCESS IS UNEVENLY AND UNFAIRLY GRANTED TO SOME AND NOT TO OTHERS;

ii) RELIGIOUS PROGRAMS WENT FROM TWICE-A-WEEK TO ONCE-A-MONTH;

iii) ALL EDUCATIONAL/VOCATIONAL PROGRAMS ARE CUT DOWN TO HALF THE TIME; AND

iv) VISITATION IS DECREASED AND KISSING VISITORS DISALLOWED

174. THEREAFTER, I FILED NUMEROUS COMPLAINT AND GRIEVANCE FORMS AGAINST EACH OF THE ABOVE-NAMED DEFENDANTS (EXCLUDING DEFENDANT GLENN YOUNGKIN) BASED ON ALL THE ISSUES DESCRIBED ABOVE, BEING THAT IT WAS MADE CLEAR THAT EACH DEFENDANT, INDIVIDUALLY AND COLLECTIVELY, WAS INVOLVED IN THE ISSUES AND ACTIONS DESCRIBED ABOVE, AND THE POLICIES WERE INHERENTLY RACIST.

175. BEGINNING ON OR ABOUT AUGUST 5, 2021, PLAINTIFF WROTE THE FOLLOWING COMPLAINTS AGAINST DEFENDANTS:

i) ABUSE OF POWER AND AUTHORITY: IMPLEMENTATION AND ENFORCEMENT OF MEMO #007-2021 IS A VIOLATION OF DUE PROCESS (IN ALL LEGAL AND POLICY MANNERS ENACTED). ASHLYN HUBBARD MAY NOT OVER-WRITE THE U.S./VA CONSTITUTION/OP/VA CODE BY A SIMPLE MEMO - WHICH PROHIBITS MEANINGFUL ACCESS TO THE COURTS, LEGAL MATERIALS, AND DUE PROCESS UNLESS ONE RECEIVES A COVID-19 VACCINE SHOT. TAKING A COVID SHOT IS NOT A PREREQUISITE TO DUE PROCESS OR UNALIENABLE - INALIENABLE RIGHTS AND FREEDOMS.



ii) RACIST / SEGREGATIONIST ACTIONS / POLICY / ABUSE OF POWER AND AUTHORITY: MS. HARTSOOK WROTE, ENACTED AND ENFORCED A POLICY, THAT WOULD CLEARLY MARGINALIZE, DISCRIMINATE AGAINST, AND DENY ONE PROCESS TO "AFRICAN-AMERICANS" (SUCH AS MYSELF), BY STATING THAT I MUST GET A COVID SHOT TO UTILIZE THE LAW LIBRARY, OR HAVE ANY MEANINGFUL ACCESS TO THE COURTS OR LEGAL MATERIALS. IT IS KNOWN BY MS. HARTSOOK THAT AFRICAN-AMERICANS ARE LESS LIKELY TO TAKE THE VACCINE. IF IT WERE THE OTHER WAY AROUND, SUCH POLICY WOULD HAVE NEVER BEEN ENACTED.

iii) VIOLATION OF EMERGENCY USE AUTHORIZATION ACT, SECTION 360bbb-3(e)(A)(ii): BY DAILY ENFORCEMENT OF A "NEW NORMAL" POLICY, I AM BEING DENIED ACCESS TO THE LAW LIBRARY DUE TO THE FACT THAT I AM EXERCISING MY RIGHT TO REFUSE TO BE INFECTED WITH A COVID-19 VACCINE UNDER EUA. THE "CONSEQUENCES FOR REFUSING INJECTION ARE ONLY THOSE "CONSEQUENCES" THAT ARE DERIVED FROM THE PRODUCT ITSELF, NOT THOSE "CONSEQUENCES" CREATED BY THOSE SEEKING TO FORCE ME TO TAKE THE PRODUCT AGAINST MY WILL AND CONSTITUTIONAL OBJECTIONS.

iv) VIOLATION OF THE EMERGENCY USE AUTHORIZATION ACT, SECTION 360bbb-3: THE FACT THAT I AM BEING DENIED EQUAL ACCESS TO MEANINGFUL ACCESS TO LEGAL MATERIALS AS UNVACCINATED PERSONS DUE TO THE FACT THAT I DO NOT WANT TO BE INJECTED WITH A COVID-19 VACCINE IS A VIOLATION OF THE EUA ACT BEING THAT THE VACCINES BEING ADMINISTERED AT THIS TIME WERE NOT DESIGNED/ APPROVED FOR USE AGAINST THE DELTA VARIANT OF COVID-19. ANY REQUIREMENT FOR INJECTION OF THIS PRODUCT IS ILLEGAL WHERE DELTA IS NOW THE MOST DOMINANT STRAIN OF COVID-19.

v) VIOLATION OF UNWETTERED PRINCIPLES AS FEARSOMELY RECOGNIZED: BY WRITING/IMPLEMENTATION/ENFORCEMENT OF MEMO #007-2021 BY ASHLYN HARTBOOK, I AM BEING KEPT IN A STATE OF CIVIL DEATH, JUST LIKE THE SLAVES WHO WERE DENIED KNOWLEDGE OF THEIR RIGHTS AND FREEDOMS AFTER THE CIVIL WAR. ASHLYN HARTBOOK'S POLICY DENIES MY ACCESS (MEANINGFUL ACCESS) UNLESS I TAKE A COVID SHOT TO WHICH I AM IMMORALLY/MEDICALLY/RELIGIOUSLY OBJECTS.

vi) RACISM AND RACIAL DISCRIMINATION IN VIOLATION OF THE VIRGINIA AND U.S. CONSTITUTIONS 5th, 8th AND 14th AMENDMENTS: UNDER THE GUISE OF COVIDARIANS PROTOCOL, MRS. HARTBOOK IS RESTRICTING ME AND THE OTHER TWO

LAW LIBRARY WORKERS ("AFRICAN-AMERICAN" AND "AAPI") WHILE ALLOWING THE CAUCASIAN LIBRARY WORKERS TO WORK. MRS. HARTBOOK ONLY ALLOWS "MINORITY" WORKERS IF THEY ARE PERFORMING SLAVE DUTIES, MENIAL WORK, SUCH AS CUSTODIAL MAINTENANCE, SWEEPING, MOPPING, CLEANING TOILETS, PROPERTY, COMMISSARY, KITCHEN, GYAROWK, MAINTENANCE, REC. WORK. EVERY INCIDENT IS BEING DOCUMENTED ON A LOG.

vii) ASHLYN HARTBOOK IS DISCRIMINATING AGAINST ME ON THE BASIS OF MY SINCERELY-HELD RELIGIOUS BELIEF BY ATTEMPTING TO SEGREGATE, ISOLATE, AND MARGINALIZE ME AFTER I TOLD THEM THAT I MAY NOT TAKE THE VACCINE WHICH WAS DEVELOPED WITH / AND CONTAINS THINGS I AM RELIGIOUSLY PROHIBITED FROM TOUCHING, INGESTING OR TAKING INTO MY BODY. THIS VACCINE EITHER CONTAINS OR WAS DEVELOPED WITH ABORTED BABY FETUS CELLS, CHIMPANZEE, ARMY WORMS, TREE BARK, ETC. I RESERVE TO RAISE THIS UNDER ANY RELEVANT LEGAL THEORY IN COURT.

viii) ACCORDING TO THE CENTERS FOR DISEASE CONTROL AND PREVENTION (CDC), THERE IS NO DIFFERENCE BETWEEN THE VACCINATED AND UNVACCINATED (ME) WHEN IT COMES TO TRANSMISSION / INFECTION WITH THE

DELTA VARIANT OF THE CORONAVIRUS. THE DELTA VARIANT IS 90% OR SO OF THE CORONAVIRUS CIRCULATING IN THE U.S. AND THERE HAS BEEN NO VACCINE MADE TO SPECIFICALLY TARGET THIS VARIANT. YOUR POLICY #007-2021 WHICH MARGINALIZES AND DISCRIMINATES AGAINST UNVACCINATED PERSONS IS NOT REASONABLE UNDER THE LAW.

ix) ALL LEGAL THEORIES HEREBY RESERVED: DISCRIMINATION WHERE THE CAUCASIAN MAINTENANCE WORKERS ARE BEING ALLOWED TO GO AND WORK BUILDING TO/IN BUILDING WITHOUT MASKS DESPITE ASHLYN HARTBOOK'S / WARDEN'S RULES THAT INMATES MAY NOT MINGLE BUILDING TO BUILDING WITHOUT MASKS DURING COVID-19. HOWEVER, MYSELF AN ASIATIC (WHOM YOU CALL "AFRICAN-AMERICAN") AM NOT BEING ALLOWED TO WORK IN THE LAW LIBRARY, CITING NO-MINGLE POLICY FOR COVID-19. THIS IS CLEAR DISCRIMINATION. THE WORKERS (4) CAME INTO 5B TODAY.

x) ALL LEGAL THEORIES HEREBY RESERVED: CAUCASIAN WORKERS FOR RECREATION WERE ALLOWED TO GO BUILDING TO BUILDING WITHOUT MASKS AND WORK WITHOUT BEING VACCINATED WHILE ME MYSELF AN ASIATIC (WHOM YOU CALL "AFRICAN-AMERICAN") WAS NOT ALLOWED TO WORK IN THE LAW LIBRARY. ASHLYN HARTBOOK, ETC. UNDER

THE GUISE OF COVID-19, IS DISCRIMINATING AGAINST NON-VACCINATED WORKERS OF DIFFERENT "RACES", ALLOWING CAUCASIANS TO Carry ON AS USUAL WHILE PREVENTING OTHERS. TODAY THE REC-WORKERS (CAUCASIANS) WERE ALLOWED.

xi) ALL LEGAL THEORIES HEREBY RESERVED: REGARDLESS OF VACCINATION STATUS, INMATES WERE ALLOWED TO WORK IN LAUNDRY, WITHOUT MASKS, SERVING INMATES BUILDING TO BUILDING AND WITH OTHER BUILDINGS, WHILE ME MYSELF (WHOM YOU CALL "AFRICAN-AMERICAN") WAS NOT ALLOWED TO WORK IN THE LAUN LIBRARY DUE TO NOT RECEIVING THE VACCINE. THIS IS CLEAR DISCRIMINATION UNDER THE GUISE OF COVID-19 POLICY. THE LAUNDRY WORKERS WERE ALLOWED TO WORK WHILE I WAS NOT.

xii) VIOLATION OF 8th AND 14th AMENDMENTS TO THE U.S. CONST. AND VA CONST.: CRUEL AND UNUSUAL PUNISHMENT IN VIOLATION OF DUE PROCESS WHERE THESE VDOC OFFICIALS CONSPIRED AND OTHERWISE AIDED AND ARE CONTINUING TO AID OTHER GOVERNMENT OFFICIALS AND CORPORATIONS TO INFECT ME WITH MULTIPLE VARIATIONS AND MUTATIONS OF COVID-19 BY USE OF GAIN-OF-FUNCTION AND FURIN CLEAVAGE SITES, WHICH WILL CAUSE THE VIRUS TO CONTINUOUSLY INFECT PEOPLE WITHOUT END OR REMEDY.



YOU MUST RELEASE ME FROM CONFINEMENT.

xiii) ALL LEGAL THEORIES ARE HEREBY RESERVED:  
PROMOTION / ENCOURAGEMENT / MANDATORY ONLY COVID-19  
VACCINE ON ME BY THE ABOVE-NAMED OFFICIALS IS FRAUD  
WHERE THESE OFFICIALS HAVE TOUTED THE EFFECTIVENESS/  
EFFICACY OF THE VACCINE PRODUCTS AT THE TIME THEY  
WERE APPROVED AS THE CURRENT EFFECTIVENESS/  
EFFICACY OF THE PRODUCT. THESE PRODUCTS USED  
AGAINST THE DELTA VARIANT ARE NOT AS EFFECTIVE  
AS PROMOTED AND THEREFORE, I SHOULD NOT BE  
PUNISHED IN ANY WAY FOR REFUSING INJECTION  
AGAINST MY WILL.

xiv) ALL LEGAL THEORIES HEREBY RESERVED: THE  
VENTILATION UNITS IN YOUR BUILDINGS ARE NOT TURNED  
ON TO CYCLE OUT THE CIRCULATED AIR DESPITE THE  
FACT THAT THERE IS THE PRESENCE OF A HIGHLY-TRANS-  
MISSIBLE DELTA VARIANT FROM THE COVID-19 VIRUS,  
WHICH HAS BEEN AMPLIFIED BY GAIN-OF-FUNCTION/  
FUZIN CLEAVAGE SITE, WHICH PROMOTES RAPID INFECTION  
AND ATTACHMENT TO HUMAN CELLS. COVID-19 AUTHORITIES  
AND EXPERTS HAVE CLEARLY STATED THAT ALL INDOOR  
SPACES MUST BE VENTILATED TO PREVENT THE RAPID  
TRANSMISSION TO PERSONS, SUCH AS MYSELF.

xv) All Legal Theories Hereby Reserved: ONE TO TWO HOURS OF OUTSIDE AIR IS DANGEROUSLY INADEQUATE, HAZARDOUS, AND VIOLATIVE, PARTICULARLY DUE TO THE FACT THAT THE DELTA VARIANT IS SPREADING, OF THE COVID-19 VIRUS, WHICH HAS BEEN AMPLIFIED BY GAIN-OF-FUNCTION/FURIN CLEAVAGE SITE, FOR WHICH YOU HAVE NO VACCINE. MORE ACCESS TO FRESH AIR/ OUTSIDE RECREATION MUST BE GIVEN TO PREVENT THE PREVENTABLE SPREAD OF THE HIGHLY TRANSMISSIBLE DELTA VARIANT WHICH IS OVER 90% PREVALENT.

xvi) All Legal Theories Reserved: STATE - SPONSORED MUNCHHAUSEN SYNDROME BY PROXY: WHILE APPEARING TO PROVIDE MEDICAL CARE AND PREVENTION FROM COVID-19 INFECTION, STATE/IDOC OFFICIALS ARE ACTUALLY MAKING PRISONERS AND STAFF MORE SUSCEPTIBLE TO COVID-19 INFECTION BY PROMOTING AND ADMINISTERING COVID-19 VACCINES, WHICH ACTUALLY USE THE SPIKE PROTEIN FROM A COVID-19 CORONAVIRUS AND INJECT SUCH VIRUS INTO RECIPIENTS. SUCH CAUSES A SLOW DEVELOPMENT OF COVID-INFECTION AND TRANSMISSION TO OTHERS THROUGH MUCOSAL MEMBRANES ENDANGERING MYSELF AND OTHERS.

176. Following the filing of such complaints, Plaintiff had several meetings and conversations with Defendants Citra Walker, J. Ruiz, K. Soutter, Charla Ann Nick Meyer and Kelsey Bowles. Plaintiff reiterated everything as stated above as he had in his meetings with A. Hartsok. Defendants doubled-down on A. Hartsok's position and stated that I would have to be injected with the "vaccine" (BWMO) in order to attend work, law library or religious services, despite the fact that I informed them that taking the "vaccine" would violate my religion and jeopardize my health and safety, that I already had Covid and had natural immunity, that no medical person has ever told me to take a vaccine, that VDOC/CWCC employees are not doctors, and my constitutionally protected rights are being violated by their requirements and restrictions.

177. Following such meetings and conversations, Plaintiff began to be retaliated against by Defendants in many ways, including but not limited to in the ways described in the following written complaints filed on, about, and after August 8, 2021:

i) A. Hartsok defamed my character, slandered and libel where they told staff and other prisoners that I posed a serious infectious health

RISK TO ALL AT CWCC AND THE LAW LIBRARY. THEY STATED THAT BECAUSE I DID NOT TAKE A COVID-19 VACCINE, THAT I POSED A HEALTH RISK TO STAFF/INMATES BEING THAT I COULD GIVE THEM A DISEASE AND I AM NOT ALLOWED TO CO-MINGLE. HOWEVER, I ALREADY HAD COVID, I HAVE NATURAL IMMUNITY, I DO NOT HAVE COVID, I LIVE IN A GREEN ZONE, AND I PRESENT NO RISK TO ANYONE. IF ANYTHING, IT IS STAFF WHO PRESENTS A RISK BECAUSE THEY GO OUT AND COME IN, AND DO NOT WEAR MASKS.

ii) HIPAA VIOLATION: THE ABOVE-NAMED OFFICIALS TOLD OTHER STAFF/PRISONERS ABOUT MY HEALTH ISSUES/VACCINATION STATUS AND TOLD THEM THAT I POSE A SERIOUS HEALTH RISK TO OTHERS AT CWCC AND THAT I CANNOT COMINGLE AT CWCC. MY MEDICAL HISTORY, TREATMENT AND MEDICATIONS IS NOT TO BE DISCUSSED WITH OTHERS OR RELEASED TO ANYONE OUTSIDE OF THE DOCTOR'S OFFICE. THIS IS A DIRECT VIOLATION OF MY MEDICAL CONFIDENTIALITY. YOU MAY NOT DISCUSS MY DISEASE HISTORY, MEDICATION, ILLNESS OR TREATMENT WITH OTHERS.

178. THE ABOVE COMPLAINTS WERE WRITTEN AFTER SEVERAL INMATES AND STAFF CAME BACK FROM THE LAW LIBRARY AND TOLD ME THAT WHEN THEY ASKED ABOUT

WHERE WAS THE LAW LIBRARY CLERK, A. HARTSOOK STATED THAT PLAINTIFF WAS NOT VACCINATED, WAS NOT ALLOWED TO CO-MINGLE WITH OTHER INMATES AND PLAINTIFF POSED A SERIOUS HEALTH RISK TO OTHERS AT CWHC AND WAS THEREFORE NOT ALLOWED TO CO-MINGLE. THIS CAUSED SEVERAL INMATES AND STAFF TO SUSPECT AND BELIEVE THAT PLAINTIFF PRESENTED A SUBSTANTIAL RISK OF HARM TO THEMSELVES AND OTHERS, AND RUMORS BEGAN TO SPREAD THAT CAUSED PLAINTIFF SUBSTANTIAL AND SIGNIFICANT REPUTATIONAL HARM AND EMOTIONAL DISTRESS.

179. DEFENDANTS A. HARTSOOK AND K. SOUTER DENIED EVERY ALLEGATION RAISED IN PLAINTIFF'S COMPLAINTS AND S. RUIZ BLOCKED EVERY SINGLE GRIEVANCE FILED PURSUANT TO THE WRITTEN COMPLAINTS. WHEN PLAINTIFF ASKED S. RUIZ WHY SHE WAS BLOCKING EVERY GRIEVANCE, RUIZ STATED THAT SHE WAS ONLY DOING AS INSTRUCTED BY HER SUPERVISOR K. SOUTER.

180. EVERY GRIEVANCE APPEAL SUBMITTED BY PLAINTIFF WAS DENIED BY DEFENDANT S. MOE-WILLIS.

181. PLAINTIFF HAD SEVERAL MEETINGS AND DISCUSSIONS WITH CARLEMAN MEYER - WHO IS CONTRACTED WITH THE WDOC THROUGH GRACE INSIDE. PLAINTIFF EXPLAINED EVERYTHING ABOVE AS HE HAD EXPLAINED TO THE OTHER DEFENDANTS. PLAINTIFF EXPLAINED THAT IT WAS NOT RIGHT TO ONLY HIM



ACCESS AND ATTENDANCE TO HIS RELIGIOUS SERVICES FOR NOT TAKING THE BLIND "VACCINES", WHERE SUCH "VACCINES" WOULD JEOPARDIZE HIS HEALTH AND VIOLATE PLAINTIFF'S SINCERELY HELD RELIGIOUS BELIEFS.

182. CHAPLAIN MEYER UNCARINGLY RESPONDED THAT THE RULE WILL BE ENFORCED THAT, DESPITE PLAINTIFF'S SINCERELY HELD RELIGIOUS BELIEFS AND OTHER ISSUES RAISED, PLAINTIFF WOULD NOT BE ABLE TO ATTEND HIS RELIGIOUS SERVICE UNLESS HE ALLOWED HIMSELF TO BE INJECTED WITH THE "VACCINE" AND 75 % OF THE OTHER PEOPLE IN HIS CURN ALLOWED THEMSELVES TO BE INJECTED. CHAPLAIN MEYER ISSUED HIS OWN MEMOS TO THIS EFFECT, AND TOLD PLAINTIFF THAT HE BELIEVES IN THE "VACCINE" AND THAT HE HAS TAKEN THE "VACCINE" HIMSELF.

183. CHAPLAIN MEYER TOLD PLAINTIFF THAT BECAUSE PLAINTIFF IS NOT "VACCINATED", MEYER WOULD REMOVE PLAINTIFF FROM BEING POINT-OF-CONTACT FOR HIS RELIGIOUS COMMUNITY. CHAPLAIN MEYER ALSO STATED THAT HE WOULD SEND TO THOSE WHO WERE NOT "VACCINATED" RELIGIOUS MATERIALS AND INFORMATION.

184. PLAINTIFF EXPLAINED TO CHAPLAIN MEYER THAT HIS CONDUCT WAS A VIOLATION OF THE FIRST AMENDMENT TO THE U.S. CONSTITUTION AND ARTICLE 1 OF THE VIRGINIA

CONSTITUTION, AS WELL AS OPERATING PROCEDURE 841.5 FOR RELIGIOUS SERVICES AND THE CONTRACT BETWEEN THE VDOC AND JARE INSIDE. PLAINTIFF EXPLAINED THAT MEYER HAS TAKEN A POSITION AS A PRISON OFFICIAL AND ENFORCER AGAINST THE RELIGIOUS COMMUNITY INSTEAD OF ADVOCATING AND REPRESENTING THE COMMUNITY'S CONCERNS TO THE PRISON ADMINISTRATION.

185. PLAINTIFF ALSO EXPLAINED THAT MEYER WAS ACTING AS A RELIGIOUS INSTRUCTOR TO PLAINTIFF'S RELIGIOUS COMMUNITY BY SELECTING FOR HIMSELF RELIGIOUS INFORMATION TO SEND TO THE COMMUNITY, OF WHICH CHAPLAIN MEYER HAS NO KNOWLEDGE. PLAINTIFF EXPLAINED THAT SUCH ACTIONS WOULD UNDOUBTEDLY CAUSE CONFUSION IN THE COMMUNITY BEING THAT MEYER DID NOT KNOW FOR HIMSELF WHAT WAS PROPER AND SOUND RELIGIOUS INSTRUCTION FOR THE COMMUNITY.

186. CHAPLAIN MEYER DISREGARDED PLAINTIFF'S CONCERNS AND BEGAN SENDING RELIGIOUS INFORMATION WITH HIS NAME PRINTED ON IT TO PLAINTIFF AND OTHER MEMBERS OF HIS RELIGIOUS COMMUNITY. THE INFORMATION THAT MEYER SENT WAS FILLED WITH ERRORS AND SOME WAS TOTALLY OFFENSIVE TO THE COMMUNITY AND CAUSED MUCH CONFUSION AND DISRUPTION AMONG THE COMMUNITY MEMBERS.

187. SOON AFTER, IN MID-SEPTEMBER, 2021 (ON OR ABOUT) REGIONAL OMBUDSMAN S. MOE-WILLIS VISITED CWCC AND CONDUCTED A "WALK-THRU" ACCOMPANIED BY S. RUIZ TO INQUIRE ABOUT PRISONER GRIEVANCE CONCERNS. BOTH DEFENDANTS S. MOE-WILLIS AND S. RUIZ STOPPED BY PLAINTIFF'S BUNK TO DISCUSS PLAINTIFF'S COMPLAINTS / GRIEVANCES / APPEALS. PLAINTIFF EXPLAINED ALL OF THE ISSUES AS STATED ABOVE AS WELL AS THE FACT THAT S. RUIZ AND S. MOE-WILLIS WERE UNREASONABLY APPLYING INAPPLICABLE AND INCOMPETENT REASONS FOR DENIAL OF FILING HIS GRIEVANCES AND APPEALS. S. MOE-WILLIS AND S. RUIZ REVIEWED ALL OF PLAINTIFF'S PAPERS, THREW THE PAPERS ONTO PLAINTIFF'S BUNK AND DISMISSED HIS ALLEGATIONS AND CONCERNS.

188. FOLLOWING SUCH MEETING WITH S. MOE-WILLIS AND S. RUIZ, PLAINTIFF FILED WITH CWCC / (DOC FILE(S)) AFFIDAVITS ASSERTING HIS REASON FOR NOT TAKING THE BLIND "VACCINES" AND COMPLAINTS RELATED TO THE FILING AND NOTIFICATIONS:

i) DEAR K. SOUTER, I.O.M.,  
ENCLOSED ARE 5 AFFIDAVITS CONCERNING COVID-19 MATTERS, AND THEIR EXHIBITS. THESE ARE MY REASONS FOR NOT GETTING COVID-19 VACCINATIONS, AND I DO NOT WANT TO BE MARGINALIZED OR DISCRIMINATED AGAINST IN ANY WAY BECAUSE OF THESE OBJECTIONS AND ASSERTIONS. PLEASE KEEP

THESE AFFIDAVITS ON FILE, WHEREAS CWHC, VDOC, CDC, UDIT AND OTHER GOVERNMENT EMPLOYEES WILL BE MADE AWARE OF THEIR NEED TO FILE RESPONSES IF ONLY TO THE AFFIDAVIT WITHIN 21 DAYS. THANK YOU.

ii) ALL LEGAL THEORIES RESERVED: I AM BEING DENIED VISITATION WITH MY FAMILY AND FRIENDS AS REQUIRED AND ALLOWED BY LAW AND VDOC POLICY BECAUSE I CHOOSE NOT TO TAKE THE COVID-19 VACCINE. I HAVE FILED 5 AFFIDAVITS TO DATE CLEARLY STATING MY REASONS FOR OBJECTING AND MY RELIGIOUS BELIEFS, WHICH ARE SINCERELY HELD. I WANT TO BE ALLOWED TO VISIT MY FAMILY AND FRIENDS NOW, AS THE LAW AND POLICY REQUIRES AND ALLOWS.

iii) ALL LEGAL THEORIES RESERVED: I AM BEING DENIED ACCESS TO MY PROGRAMS AND SERVICES AS REQUIRED AND ALLOWED BY LAW AND VDOC POLICY BECAUSE I CHOOSE NOT TO TAKE THE COVID-19 VACCINE. I HAVE FILED 5 AFFIDAVITS TO DATE CLEARLY STATING MY REASONS FOR OBJECTION AND MY RELIGIOUS BELIEFS WHICH ARE SINCERELY HELD. I WANT TO BE ALLOWED TO ATTEND MY PROGRAMS AND SERVICES NOW, AS THE LAW AND POLICY REQUIRES AND ALLOWS.

189. PLAINTIFF ALSO SUBMITTED TO ALL DEFENDANTS (EXCLUDING JENN YOUNGKIN) NOTIFICATION OF PLAINTIFF'S FILED AFFIDAVITS AND REQUESTS TO RESPOND WITHIN 21 DAYS IF THEY HAD ANY OBJECTIONS.

190. DEFENDANTS A. HARRISBROOK AND K. SOUTER DENIED EACH COMPLAINT AND J. RUIZ BLOCKED EVERY GRIEVANCE FILED PURSUANT TO PLAINTIFF'S COMPLAINT. ADDITIONALLY, ALL DEFENDANTS CHOSE NOT TO RESPOND TO PLAINTIFF'S AFFIDAVITS.

191. PLAINTIFF HAD SEVERAL CONVERSATIONS WITH CHAD WALKER STATING ALL AS DESCRIBED ABOVE AS WELL AS THE FACT THAT J. RUIZ WAS BLOCKING EVERY SINGLE GRIEVANCE THAT PLAINTIFF SUBMITTED PURSUANT TO HIS COMPLAINTS. CHAD WALKER STATED THAT HE DOESN'T WANT TO HAVE ANYTHING TO DO WITH THIS ANYMORE AND THAT EVERYTHING IS COMING FROM A. HARRISBROOK, K. SOUTER, K. BOWLES, H. CLARKE AND R. NORTHAM. CHAD STATED THAT IT IS UP TO J. RUIZ AND K. SOUTER TO FILE GRIEVANCES.

192. PLAINTIFF EXPLAINED THAT PER HAROLD CLARKE'S MEMO DATED DECEMBER 14, 2020, SENT FROM A. DAVID ROBINSON, CHIEF OF OPERATIONS FOR THE VDOC AND JOSEPH W. WATERS, DEPUTY DIRECTOR:



"BEGINNING FEBRUARY 1, 2021 A NEW OPERATING PROCEDURE WILL GO INTO EFFECT. THE UPDATES TO THE PROCEDURE ARE INTENDED TO MAKE THE PROCEDURE MORE USER FRIENDLY BY STREAMLINING THE GRIEVANCE AND THE APPEAL PROCESS, BY LIMITING THE REASONS FOR WHICH A GRIEVANCE CAN BE REJECTED, AND BY ENSURING GRIEVANCES OF A MEDICAL NATURE ARE SENT TO MEDICAL STAFF FOR PROCESSING. UPDATED PROCEDURES ARE AVAILABLE FOR REVIEW UPON REQUEST. SHOULD YOU HAVE ANY QUESTIONS REGARDING THE UPDATES, PLEASE CONTACT YOUR FACILITY'S HRA.

193. THIS MEMO WAS WRITTEN AFTER A HEARING IN A CIVIL ACTION SECTION 1983 CASE FOR PRISONER JESUS EMANUELLE JETHVAH, IN THE UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF VIRGINIA, ALEXANDRIA DIVISION, ON NOVEMBER 20, 2020 IN WHICH JETHVAH SUCCESSFULLY DEFENDED AGAINST THE ATTORNEY GENERAL OF VIRGINIA'S REQUEST TO DISMISS JETHVAH'S PETITION FOR FAILURE TO EXHAUST. JETHVAH PRESENTED ARGUMENT AND EVIDENCE THAT VDOC, AND IN PARTICULAR CWCC, REFUSED TO FILE 99% OF PRISONER GRIEVANCES. THE ATTORNEY GENERAL, AS COUNSEL FOR DEFENDANT HAROLD CLARKE, WAIVED THIS DEFENSE DURING THIS HEARING IN LIGHT OF THE FACTS AND ARGUMENTS PRESENTED. SUBSEQUENTLY AND CONSEQUENTLY, A. ORVIO ROBINSON WROTE THE ABOVE MEMO, TO NO AVAIL. GRIEVANCES ARE CONTINUOUSLY BLOCKED EVEN UNTIL THIS DATE.

194. DEFENDANT CHAP WALKER STATED THAT HE DID NOT WANT TO GET INVOLVED ANY FURTHER AND DISMISSED THE REST OF PLAINTIFF'S CONCERNS.

195. THEREAFTER, PLAINTIFF WAS SUBJECTED TO ADDITIONAL RETRIALATION AND HE BEGAN TO WRITE ADDITIONAL COMPLAINTS STARTING ON OR ABOUT OCTOBER 7, 2021 AS FOLLOWS:

i) ON OR ABOUT OCTOBER 7, 2021, AFTER I WAS CALLED TO WORK FOR ABOUT 45 MINUTES, I WAS TOLD TO LEAVE BY D. HOUSE FOR NO REASON. D. HOUSE STATED THAT SHE WAS TOLD TO MAKE ME LEAVE BY ABIGYAL HARTSOOK. I ASKED D. HOUSE WHY THIS HAPPENED ON SEVERAL OCCASSIONS, SHE STATED SHE WAS JUST DOING AS SHE WAS TOLD BY A. HARTSOOK. I HAVE ALREADY EXPLAINED THAT THEIR CONDUCT VIOLATES THE LAW. ALL LEGAL THEORIES RESERVED.

ii) ON OR ABOUT OCTOBER 12, 2021, AFTER BEING CALLED TO THE LAW LIBRARY TO WORK I WAS TOLD TO LEAVE BY THE C/O AND THE LAW LIBRARY WAS SHUT DOWN FOR NO REASON. I WAS NOT ABLE TO DO ANY TASKS OR RESEARCH.

iii) ON OR ABOUT OCTOBER 19, 2021, AFTER BEING CALLED TO THE LAW LIBRARY, I WAS INFORMED THAT

THE LEGAL DATABASE AND SERVER WAS DOWN AS WELL AS THE COPY MACHINE. THEREFORE, I COULD NOT DO ANY LEGAL RESEARCH OR MAKE ANY COPIES. ASHLYN HARTSOOK STATED THAT THE EQUIPMENT WILL BE OUT OF SERVICE FOR THE FORESEEABLE FUTURE.

iv) ALL LEGAL THEORIES RECOVERED: FOR SOME ILLEGAL REASON AND BY SOME ILLEGAL METHOD, YOU CHANGED MY CLASS LEVEL FROM A CLASS LEVEL 1 TO A CLASS LEVEL 2. I JUST RECEIVED THE UPDATE SHEET LAST NIGHT AT MAIL CALL. YOU CHANGED MY RELEASE DATE. HOWEVER, I JUST HAD AN ANNUAL REVIEW AND AM AT CLASS LEVEL 1. THERE'S NO REASON TO CHANGE ME FROM A 1 TO A 2 AND NO ICA WAS CONDUCTED TO DO THIS. THIS IS RETALIATION FOR ME NOT TAKING THE SHOT FOR COVID-19.

v) ALL OF PLAINTIFF'S GRIEVANCE APPEALS WERE DENIED BY J. MOE-WILLIS AS UNTIMELY EVEN THOUGH PLAINTIFF TIMELY SUBMITTED ALL OF HIS APPEALS VIA THE PRISON'S BULK MAIL SYSTEM - WHICH IS SUPPOSED TO LOG THE DATE WHEN PRISONERS SUBMIT THEIR APPEALS TO THE REGIONAL OFFICE. J. MOE-WILLIS PURPOSELY DELAYED THE STAMPING AND FILING OF PLAINTIFF'S APPEALS TO MAKE IT APPEAR AS IF PLAINTIFF SUBMITTED THEM LATE.

vi) COUNSELOR JUTIGERREZ REVIEWED THE CHANGE OF PLAINTIFF'S GOOD-TIME LEVEL AND RELEASE DATE UPON PLAINTIFF'S REQUEST. JUTIGERREZ INFORMED PLAINTIFF THAT DEFENDANT CHAP WALKER WAS THE ONE RESPONSIBLE FOR ANY SUCH CHANGES TO GOOD-TIME. COUNSELOR JUTIGERREZ CONFERRED WITH COUNSELOR BLANKENSHIP - WHO HAD JUST RECENTLY CONDUCTED PLAINTIFF'S ANNUAL REVIEW AND CLASS LEVEL. COUNSELOR BLANKENSHIP INFORMED PLAINTIFF THAT HIS CLASS LEVEL SHOULD HAVE BEEN A 1, BUT THAT SHE DETERMINED A. HARTSOOK MADE THIS CHANGE FOR SOME UNKNOWN REASON. THE FOLLOWING WEEK, COUNSELOR BLANKENSHIP INFORMED PLAINTIFF THAT CHAP WALKER SENT HER AN EMAIL TO CONFIRM THAT THEY HAD MADE THE CHANGE. PLAINTIFF INFORMED COUNSELOR BLANKENSHIP THAT THIS WAS ALL RETALIATION DUE TO THE FACT THAT PLAINTIFF WOULD NOT TAKE THE COVID "VACCINE" AS THEY WERE TRYING TO MAKE HIM DO.

vii) PLAINTIFF HAS NOT BEEN ALLOWED ACCESS TO THE LAW LIBRARY FOR OVER THE LAST 6 MONTHS. CONSEQUENTLY, PLAINTIFF HAS BEEN OBSTRUCTED BY DEFENDANTS AND UNABLE TO RESEARCH, PREPARE OR PRESENT HIS HABEAS CORPUS PETITION, HIS PETITION FOR

PARDON, AND THIS PETITION UNTIL NOW. MEANWHILE, OTHER PRISONERS HAVE BEEN ABLE TO SEEK REDRESS OF THEIR GRIEVANCES AND HAVE OBTAINED RELIEF FROM THE COURTS AND HAVE BEEN ISSUED PARDONS.

Viii) FOR FEAR OF FURTHER RETRIBUTION, PLAINTIFF HAS, FOR THE MOST PART, STOPPED FILING COMPLAINTS AND GRIEVANCES ALTHOUGH SEVERAL OTHER ISSUES HAVE ARISEN.

196. DEFENDANTS TO THIS VERY DAY STILL REFUSE TO TURN ON THE VENTILATION SYSTEM, STILL REFUSE TO GIVE PRISONERS AT CWCC MORE THAN 50 MINUTES OF FRESH AIR OUTSIDE - EVEN THOUGH PRISONERS AT CWCC LIVE IN A CRAMPED DORM WITH 80 PEOPLE (PLUS STAFF) IN THE ROOM, WITH BUNK BEDS, AND LESS THAN 2 1/2 FEET OF SPACE BETWEEN EACH BUNK.

197. DEFENDANTS STILL MOVE PRISONERS BUILDING-TO-BUILDING, TRANSFER PRISON-TO-PRISON, AND ON OR ABOUT DECEMBER 23, 2021, COUNSELOR JUTIGRETT WENT PERSON-TO-PERSON SHAKING HANDS IN PLAINTIFF'S DORM IN 5B. LESS THAN 7 DAYS AFTER, THERE WAS A COVID OUTBREAK THROUGHOUT THE DORM. DEFENDANT K. SOUTER COVERED THIS ISSUE UP AND SAID THAT SHE CHECKED THE CAMERAS AND IT NEVER HAPPENED.



198. THROUGHOUT THIS TIME PERIOD AND ALL TIMES RELEVANT TO THIS COMPLAINT, PLAINTIFF SUFFERED EXTREME EMOTIONAL DISTRESS, PSYCHOLOGICAL DAMAGE, PERSONAL HUMILIATION, MENTAL ANGUISH, LOSS OF LIBERTY AND INJURIES TO PLAINTIFF'S QUALITY OF LIFE, LIVING CONDITIONS, DEPRIVATIONS OF PRIVILEGES, AND HARASSMENTS FROM "DISABILITIES," ALL DUE TO DEFENDANTS' ACTIONS AND CONDUCT AS EXPLAINED HEREIN.

199. DEFENDANTS REPEATEDLY PRESSURED PLAINTIFF TO TAKE A "VACCINE" THAT PLAINTIFF BELIEVES WILL HARM HIM PHYSICALLY AND MEDICALLY, AS WELL AS SPIRITUALLY. PLAINTIFF BELIEVES THAT TAKING SUCH A "VACCINE" - WHICH IS A BLIND AND AN ABOMINATION - WOULD TAKE HIM OUT OF HARMONY WITH HIS GOD, HIS FAMILY, HIS COMMUNITY, AND HIS OWN CONSCIENCE. DEFENDANTS - WHOM ARE NOT DOCTORS - GAVE PLAINTIFF MEDICAL ADVICE OUTSIDE OF THEIR LIMITED CAPACITIES, TO OBEY PLAINTIFF'S OWN DOCTORS' ASSESSMENTS AND ADVICE THAT PLAINTIFF IS NATURALLY IMMUNE.

200. DUE TO DEFENDANTS' ACTIONS, CONDUCT AND DIRECT STATEMENTS TO PLAINTIFF, OTHER PRISONERS AND STAFF MEMBERS, PLAINTIFF HAS BEEN TREATED AS IF HE HAS DONE SOMETHING WRONG, AND THAT HE HAS MADE UNHEALTHY AND SOCIALLY RISKY CHOICES BY NOT TAKING A "VACCINE." PRISONERS AND STAFF MEMBERS HAVE MADE COMMENTS TO PLAINTIFF AND HAVE EVEN AVOIDED PLAINTIFF BECAUSE THEY WERE

MADE TO BELIEVE THAT PLAINTIFF WOULD ENDANGER THEM.

201. PLAINTIFF HAS BEEN SPIRITUALLY AND RELIGIOUSLY ISOLATED FROM HIS COMMUNITY DUE TO DEFENDANTS' ACTIONS AND CONDUCT AND DENIAL OF ACCESS TO HIS RELIGIOUS SERVICES.

202. PLAINTIFF HAS BEEN UNABLE TO RESEARCH, PURSUE AND PROSECUTE HIS LEGAL ISSUES, HAS MISSED MANY DEADLINES AND OPPORTUNITIES, INCLUDING SEEKING A PARDON BY THE OUTGOING DEMOCRATIC GOVERNOR, WHEREAS OTHER PRISONERS WERE ABLE TO PREPARE THEIR PARDON

PETITIONS IN THE LAW LIBRARY AND RECEIVED PARDONS, AS THEY WERE VACCINATED. HAD PLAINTIFF BEEN ABLE TO PREPARE AND PRESENT HIS PETITION, IT IS LIKELY THAT PLAINTIFF WOULD HAVE BEEN ABLE TO RECEIVE A PARDON.

203. ADDITIONALLY, THE LACK OF OUTSIDE AIR, OUTSIDE RECREATION, AND VENTILATION HAS LED TO AN INCREASE IN COVID CIRCULATION, CONSTANTLY BREATHING CONTAMINATED AIR, OTHER SICKNESSES, WEIGHT GAIN, INCREASE IN BLOOD PRESSURE AND STRESS, AS WELL AS MOLD, ALL DUE TO DEFENDANTS' CONDUCT AND ACTIONS.

204. FURTHERMORE, EVEN UNTIL TODAY, DEFENDANTS ARE PESSING NON-SENSICAL MASK POLICIES THAT ARE CAUSING HARM AND NO GOOD. DEFENDANTS ARE DEMANDING THAT MASKS

BE PUT ON WHEN GOING OUTSIDE INTO THE FRESH AIR. MOREOVER, THE MASKS PROVIDED ARE SUFFOCATION MASKS THAT DEFENDANTS HAVE HAND-SEWN OR PURCHASED FOR A CHEAP PRICE.

205. SCIENTISTS AND RESEARCHERS HAVE ALREADY REPORTED THAT MASKS HAVE DONE LITTLE TO NO GOOD DURING THIS COVID-19 "PANDEMIC" TO PREVENT INFECTION OR TRANSMISSION, AND THAT THE ONLY MASKS THAT HAVE ANY MEASURABLE BENEFIT WHATSOEVER ARE N95 MASKS - WHICH DEFENDANTS DO NOT AND HAVE NEVER AND NEVER WILL PROVIDE.

206. PLAINTIFF DOES NOT HAVE THE RIGHT AMOUNT OF WORDS TO DESCRIBE THE EXTENT OF THE TRAMA AND DAMAGE THAT HE HAS SUFFERED AS A DIRECT AND INDIRECT RESULT OF DEFENDANTS' ACTIONS AND CONDUCT; HOWEVER PLAINTIFF HAS SIGNIFICANT AND SUBSTANTIAL AMOUNTS OF REPORTS FROM EXPERTS WHO HAVE EVALUATED SUCH CONDITIONS AND HAVE FOUND SUCH CONDITIONS TO BE EXTREMELY DAMAGING OVER TIME. MOREOVER, PLAINTIFF HAS HAD TO EXPEND HUNDREDS OF DOLLARS FOR COPIES, SUPPLIES AND MATERIAL, MAILINGS, PHONE CALLS, EMAILS, RESOURCES, AND BOOKS, IN ADDITION TO THE HOURS SUCH LEGAL WORK AND RESEARCH ENTAILS.

THOSE COSTS ARE ONGOING AND ARE BEING TABULATED AT THIS TIME TO EQUAL \$10,984.00.

II. PLAINTIFF SUSPECTS DEFENDANTS' CONDUCT IS DUE TO THEIR INVOLVEMENT IN A CONSPIRACY TO PROFIT FROM COVID-19 "PANDEMIC" AND "VACCINES"; PLAINTIFF SUSPECTS DEFENDANTS' "HANDS" ARE IN THE "COOKIE JAR."

207. FOLLOWING THE UNLEASHING OF THE BMMO COVID-19, THE UNITED STATES GOVERNMENT HAS OPENED UP MANY WAYS FOR CORPORATIONS, ENTITIES, AND PRIVATE PERSONS TO PROFIT FROM THE "PANDEMIC", TESTING SITES, AND "VACCINATION CENTERS."

208. THE U.S. GOVERNMENT, STATE GOVERNMENTS, LOCAL GOVERNMENTS, CORPORATIONS AND ENTITIES, HAVE ESTABLISHED VARIOUS PROGRAMS TO INCENTIVIZE PEOPLE TO TAKE "VACCINES", INCLUDING BUT NOT LIMITED TO GIVING "JOINTS FOR VABS", SIX-PACK OF BEERS, CASH AND PRIZE LOTTERIES, AND ALL OTHER TYPES OF VICES.

209. GOVERNMENTS AND CORPORATIONS QUICKLY SHIFTED FROM INCENTIVIZING TO COERCING THESE "SUBJECT TO THEIR JURISDICTION", POWER AND AUTHORITY, DOMINANCE AND CONTROL, TO BE INJECTED WITH THE BMMO "VACCINES", ALL UNDER THE GUISE OF TRYING TO KEEP THE PEOPLE SAFE AND HEALTHY, NO MATTER THE ACTUAL "COST" TO THE PERSON'S HEALTH, SAFETY, RELIGION, OR SPIRITUAL/MORAL SITUATION.

210. FURTHERMORE, IT HAS BEEN RECENTLY REVEALED THAT GOVERNMENT OFFICIALS, CORPORATION PERSONNEL, RELIGIOUS LEADERS, AND EVEN FEDERAL JUDGES HAVE BEEN INCENTIVIZED IN ONE WAY OR ANOTHER TO PROMOTE AND COERCE THOSE UNDER THEIR CONTROL TO TAKE VACCINES AND ARE PROFITING DIRECTLY FROM THE VACCINES AND THE PROLONGING OF THE COVID-PANDEMIC.



## CLAIMS FOR RELIEF

211. THE FACTS AND ALLEGATIONS AS STATED ABOVE ARE HEREBY RESTATED HERE AND IN EACH AND EVERY CLAIM BELOW.

212. **CLAIM ONE:** DEFENDANTS' MANDATES AND ATTEMPTS TO COMPEL INJECTION UPON PLAINTIFF WITH A COVID-19 BLIND "VACCINE" - WHICH WILL SUBJECT PLAINTIFF TO IRREPARABLE HARM, AND ALL ACTIONS TAKEN AGAINST PLAINTIFF RELATED THERETO, VIOLATES THE FIFTH, EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE I, SECTIONS 1, 3, 8, 9 AND 11 OF THE VIRGINIA CONSTITUTION.

213. DEFENDANTS ACTING UNDER COLOR OF STATE LAW AND HABEAS ARE PROHIBITED FROM TAKING PLAINTIFF'S LIFE OR LIBERTY WITHOUT DUE PROCESS OF LAW AND ARE CONSTITUTIONALLY PROHIBITED FROM SUBJECTING PLAINTIFF TO CRUEL AND UNUSUAL PUNISHMENTS.

214. ADDITIONALLY, PLAINTIFF HAS ALREADY HAD COVID-19 AND, ACCORDING TO HIS DOCTOR AND SCIENTIFIC RESEARCH, IS NATURALLY IMMUNE TO COVID-19, AND POSSESSES TWO-LEVELS OF IMMUNITY TO COVID-19.

215. DEFENDANTS, WHO ARE NOT DOCTORS, ARE IMPOSING MEDICAL MANDATES AND PROCEDURES UPON PLAINTIFF THAT ARE NOT NECESSARY, AND IS LIKELY TO CAUSE FURTHER SPREAD OF COVID-19.

216. IT IS PLAINTIFF'S PERSONAL HEALTH CHOICE THAT HE NOT TAKE A COVID-19 "VACCINE".

217. CLAIM TWO: DEFENDANTS' MANDATES AND ATTEMPTS TO INJECT PLAINTIFF WITH A COVID-19 "VACCINE" WILL SUBJECT PLAINTIFF TO IRREPARABLE HARM AND VIOLATE THE NINTH AND TENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE I, SECTIONS 1, 2, 3, 7 AND 17 OF THE VIRGINIA CONSTITUTION.

218. THE RIGHT TO DECIDE WHAT ONE WANTS TO DO WITH HIS OWN HEALTH IS RESERVED TO THE PEOPLE, AND PLAINTIFF SHOULD NOT BE TARGETED FOR HARM BY DEFENDANTS WITH THE COVID-19 "VACCINE", NOR PUNISHED, DISCRIMINATED AGAINST OR MARGINALIZED IN ANY WAY FOR MAKING A CHOICE FOR HIS OWN HEALTH AND WELL-BEING.

219. CLAIM THREE: DEFENDANTS' ACTIONS AND CONTINUOUS ACTIONS IN PUNISHING PLAINTIFF AND BLOCKING HIM FROM HIS RELIGIOUS SERVICES, THE LAW LIBRARY AND LEGAL MATERIALS, WORK, PROGRAMS, VISITATION, ETC., VIOLATES THE FIRST, FIFTH,

EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE I, SECTIONS 1, 2, 3, 7, 11 AND 16, OF THE VIRGINIA CONSTITUTION.

220. DEFENDANTS MAY NOT FORCE PLAINTIFF TO VIOLATE HIS SINCERELY-HELD RELIGIOUS BELIEFS IN ORDER TO ATTEND HIS RELIGIOUS SERVICE, WORK, LAW LIBRARY, VISITATION WITH HIS FAMILY, ETC.

221. IT IS THE RIGHT OF THE PEOPLE TO DETERMINE THESE MATTERS OF HEALTH RELIGION AND THE STATE AND ITS AGENTS - IF THEY ACTUALLY ARE AGENTS OF THE STATE - MUST SEEK TO PROTECT AND ENCOURAGE THE FREE EXERCISE OF RELIGIOUS CONSCIENCE AND BELIEF. "[I]T IS THE MUTUAL DUTY OF ALL TO PRACTICE CHRISTIAN FOREBEARANCE, LOVE, AND CHARITY TOWARDS EACH OTHER. NO MAN SHALL BE COMPELLED TO FREQUENT OR SUPPORT ANY RELIGIOUS WORSHIP, PLACE, OR MINISTRY, WHATSOEVER, NOR SHALL BE ENFORCED, RESTRAINED, MOLESTED, OR BURTHENED IN HIS BODY OR GOODS, NOR SHALL OTHERWISE SUFFER ON ACCOUNT OF HIS RELIGIOUS OPINIONS OR BELIEF." (VIRGINIA CONST., ART. I, SEC. 16).

222. DEFENDANTS' CONDUCT IN MANDATING UPON PLAINTIFF THAT HE BE INJECTED WITH A SHOT THAT PLAINTIFF SINCERELY BELIEVES IS AN ABOMINATION TO GOD, VIOLATES NOT ONLY THE POSITIVE LAW PRINCIPLES OF THE STATE, BUT IT ALSO VIOLATES

## DIVINE AND NATURAL LAW PRINCIPLES OF THE CREATOR.

223. AN EXAMPLE OF THOSE WHO SEEK TO MAKE MEN OF GOD VIOLATE DIVINE LAW IS CHAPTER 1 OF THE BOOK OF DANIEL IN THE HOLY BIBLE. KING NEBUCHADNEZZAR DID DESIRE AND SEEK TO COMPEL DANIEL, HANANIAH, MISHAEL, AND AZARIAH TO EAT OF THE KING'S "MEAT", WHICH WAS AN ABOMINATION TO THEM AND GOD. BUT DANIEL AND THE MEN DID NOT EAT OF THE KING'S "MEAT," AND THEY WERE RESTORED FOR IT.

224. ALSO, THERE IS THE EXAMPLE FROM DANIEL CHAPTER 3, WHERE KING NEBUCHADNEZZAR SOUGHT TO HAVE THE MEN OF GOD WORSHIP HIM AS IF HE WERE GOD AND, OF COURSE, THEY REFUSED. AND, LIKE ALL UNRIGHTEOUS MEN WHO WANT TO BE SEEN ON EARTH AS GOD, KING NEBUCHADNEZZAR SOUGHT TO PUNISH THE MEN OF GOD BY THROWING THEM IN THE FIERY FURNACE; HOWEVER, THE KING'S MEN WERE DESTROYED AS THEY TRIED TO DESTROY THE MEN OF GOD.

225. THEN THERE IS THE EXAMPLE OF THE SO-CALLED MACCABEAN REVOLT DESCRIBED IN THE APOCRYPHAL BOOK 1 MACCABEES WHERE THE SELUCID (GREEK) KING ANTIOCHUS IV EPIPHANES SOUGHT, ON DECEMBER 25, 167 B.C., TO SACRIFICE A PIG (UNCLEAN AND AN ABOMINATION TO THE MEN OF GOD) ON THE HOLY ALTAR IN THE HOLY TEMPLE IN WHICH ANTIOCHUS ERECTED HIS OWN ALTAR TO ZEUS OVER THE HOLY ALTAR.

THIS WAS AN EXAMPLE OF THE "ABOMINATION THAT CAUSES  
REBELLION" IN DANIEL 9:27; 11:31 AND 12:11. AND THIS  
LED TO THE SO-CALLED MACCABEAN REVOLT.

226. **CLAIM FOUR: DEFENDANTS' ACTIONS IN ALLOWING  
AND COMPELLING VACCINATED AND UNVACCINATED PRISONERS TO ATTEND  
STATE SPONSORED (RELIGIOUS) RE-ENTRY PROGRAMS, WHILE PROHIBITING  
PRISONER(S)/PLAINTIFF WHO ARE UNVACCINATED FROM ATTENDING  
HIS OWN RELIGIOUS SERVICES, VIOLATES THE FIRST, FIFTH, EIGHTH,  
NINTH, TENTH AND FOURTEENTH AMENDMENTS TO THE UNITED  
STATES CONSTITUTION, AS WELL AS ARTICLE I, SECTIONS 1, 2, 3,  
7, 8, 9, 11, 12, 16 AND 17 OF THE VIRGINIA CONSTITUTION.**

227. WHILE PLAINTIFF IS RESTRICTED BY DEFENDANTS FROM  
ATTENDING HIS OWN RELIGIOUS SERVICES, DEFENDANTS MANDATE UPON  
OTHER SIMILARLY-SITUATED PRISONERS TO ATTEND AND BE HOUSED  
IN THE STATE-RUN REENTRY PROGRAM, REGARDLESS OF VACCIN-  
ATION STATUS.

228. THE STATE-RUN REENTRY PROGRAM IS TANTAMOUNT  
TO A STATE-SPONSORED RELIGIOUS PROGRAM, THAT COMPELS ATTENDEES  
TO CLAP, CHANT, ENGAGE IN COMPELLED SPEECH, DISCUSS STATE-  
CHOSEN PHILOSOPHIES AND QUOTES-OF-THE-DAY, AND TELLS  
ATTENDEES TO "LEAVE YOUR RELIGION AT THE DOOR."

229. DISALLOWING PLAINTIFF HIS RELIGIOUS SERVICE MERELY



BECAUSE HE CHOOSES NOT TO VIOLATE HIS SINCERELY-HELD RELIGIOUS BELIEFS BECAUSE HE CHOOSES NOT TO "VACCINATE", WHILE ALLOWING "VACCINATED" INDIVIDUALS ACCESS TO THEIR RELIGIOUS PROGRAMS IS DISCRIMINATION AND IS A VIOLATION OF EQUAL PROTECTION OF THE LAW. DEFENDANTS ARE PROHIBITED FROM PUNISHING PLAINTIFF IN ANY WAY DUE TO HIS RELIGIOUS BELIEFS, AND DEFENDANTS SHOULD DO WHATEVER POSSIBLE TO AID PLAINTIFF IN THE FREE EXERCISE THEREOF.

230. THE FIRST CLAUSE OF THE FIRST AMENDMENT READS, "CONGRESS SHALL MAKE NO LAW RESPECTING AN ESTABLISHMENT OF RELIGION, OR PROHIBITING THE FREE EXERCISE THEREOF."

231. THE PURPOSE OF THE "ESTABLISHMENT CLAUSE" WAS TWO-FOLD: (1) TO PROHIBIT CONGRESS FROM IMPOSING A NATIONAL RELIGION UPON THE PEOPLE; AND (2) TO PROHIBIT CONGRESS (AND THE FEDERAL GOVERNMENT GENERALLY) FROM INTERFERING WITH EXISTING CHURCH-STATE RELATIONS IN THE SEVERAL STATES. THUS THE "ESTABLISHMENT CLAUSE" IS LINKED DIRECTLY TO THE "FREE EXERCISE CLAUSE". IT WAS DESIGNED TO PROMOTE RELIGIOUS FREEDOM BY FORBIDDING CONGRESS TO PREFER ONE RELIGIOUS SECT OVER OTHER RELIGIOUS SECTS. IT WAS ALSO INTENDED, HOWEVER, TO ASSURE EACH STATE THAT ITS RESERVED POWERS INCLUDED THE POWER TO DECIDE FOR ITSELF, UNDER ITS OWN CONSTITUTION OR BILL OF RIGHTS, WHAT KIND OF RELATIONSHIP IT WANTED WITH RELIGIOUS DENOMINATIONS IN THE STATE. HENCE THE IMPORTANCE OF

THE WORD "RESPECTING" CONGRESS SHALL MAKE NO LAW "RESPECTING," THAT IS, TOUCHING OR DEALING WITH, THE SUBJECT OF RELIGIOUS ESTABLISHMENT.

232. IN SHORT, THE ESTABLISHMENT CLAUSE OF THE FIRST AMENDMENT WAS NOT INTENDED AS A DECLARATION OF GOVERNMENTAL HOSTILITY TOWARD RELIGION, OR EVEN OF GOVERNMENTAL NEUTRALITY, IN THE DEBATE BETWEEN BELIEVERS AND NON-BELIEVERS. IT WAS SIMPLY A DEVICE FOR KEEPING RELIGIOUS PASSIONS OUT OF AMERICAN POLITICS. THE PHRASE "OR PROHIBITING THE FREE EXERCISE THEREOF" WAS MEANT TO KEEP THE CONGRESS FROM EVER MINGLING IN THE DISPUTES AMONG RELIGIOUS BODIES OR INTERFERING WITH THE MODE OF WORSHIP (1791: US BILL OF RIGHTS (1ST 10 AMENDMENTS) - WITH COMMENTARY - ONLINE LIBRARY OF LIBERTY, PG. 5, 6).

233. DEFENDANTS' CONTINUING ACTIONS IN ALLOWING "VACCINATED" PRISONERS TO ATTEND THEIR RELIGIOUS SERVICE WHILE NOT ALLOWING "UNVACCINATED" TO ATTEND THEIR RELIGIOUS SERVICES IS INHERENTLY "RACIST" AND FAVORS CAUCASIAN - FAITH RELIGIOUS (EUROPEANS) OVER AND AGAINST THOSE CLASSED AS "BLACKS" AS PLAINTIFF IS CURRENTLY CLASSED IN THE UNITED STATES AND VIRGINIA CORPORATIONS AND CORPORATE SYSTEMS. "WHITES" - AS MOST EUROPEAN CAUCASIANS HAVE BEEN CLASSED - ARE MORE LIKELY TO TRUST THE EURO-SCIENCES AND TAKE THE "VACCINE." DEFENDANTS ACTUALLY PLAY A VIDEO EVERY DAY AT CWCC IN WHICH VARIOUS VDOC OFFICIALS AS WELL AS DR. FAUCI AND DEFENDANT NORTHAM ATTEST TO THIS

FACT AND REALITY. IF THE SITUATION WERE REVERSED, AND IT WAS THE SO-CALLED "BLACKS" WHO WERE TAKING THE "VACCINE," AND THE SO-CALLED "WHITES" WERE NOT, DEFENDANTS WOULD HAVE NEVER MADE A RULE THAT ONLY THE "VACCINATED" WOULD BE ALLOWED TO ATTEND THE LAW LIBRARY, RELIGIOUS SERVICES, SCHOOL/EDUCATION, PROGRAMS, LOCATIONS, VISITATION WITH FAMILY, AND GET MARRIED. CAN YOU IMAGINE?

234. **CLAIM FIVE:** DEFENDANTS' IMPLEMENTATION OF A SO-CALLED "NEW NORMAL" (AS DESCRIBED ABOVE) IS THE EFFECTIVE SUSPENSION OF THE LAWS AND CONSTITUTIONS OF THE UNITED STATES AND VIRGINIA, AS WELL AS THEIR CONCOMITANT CODES, STATUTES, RULES AND OPERATING PROCEDURES. DEFENDANTS' DISPARAGEMENT OF THE PEOPLES' (PLAINTIFFS) RIGHTS AND SUSPENSION OF THE LAWS AND CONSTITUTION VIOLATES THE NINTH, TENTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION AS WELL AS ARTICLE 1, SECTIONS 2, 3 AND 7 OF THE VIRGINIA CONSTITUTION.

235. THE POWER BELONGS TO THE PEOPLE, AND GOVERNMENT OFFICIALS MAY NOT SUSPEND PLAINTIFF'S RIGHTS TO FREE EXERCISE OF HIS RELIGION, ATTEND HIS RELIGIOUS SERVICES, GO TO THE LAW LIBRARY, LIKE EVERYONE ELSE, HAVE ADEQUATE AND MEANINGFUL ACCESS TO THE COURTS AND LEGAL MATERIALS, OR ANY OF THE OTHER PROGRAMS, SERVICES, ACTIVITIES OR PRIVILEGES SO NAMED HEREIN.

236. By denying Plaintiff these things based upon their self-created "New Normal," Defendants are effectively suspending the Habeas Corpus. Plaintiff has been attempting to file a Habeas Corpus petition to allege that he is being illegally detained in violation of substantive constitutional due process laws. In his Habeas Corpus, Plaintiff argues that he was convicted and sentenced in a manner that violates due process and thus his conviction is void. Where a conviction and/or sentence is obtained in a manner that violates due process, a court loses jurisdiction to enter or impose judgments. Issues pertaining to lack of jurisdiction and void judgments can be raised by anybody, at any time, in any court, in any manner.

237. Additionally, Plaintiff has been severely delayed in bringing this action due to Defendants' unconstitutional conduct, restrictions and obstructions, or "The New Normal."

238. **CLAIM SIX:** Being that Plaintiff is alleging that his conviction and sentence was made in violation of due process, Defendants' actions in detaining and restraining Plaintiff effectively violate the First, Fifth, Thirteenth and Fourteenth Amendments to the United States Constitution, as well as Article I, Sections 1, 2, 3 and 7 of the Virginia Constitution. Due to the fact that Plaintiff's

CONVICTION AND DETENTION IS IN VIOLATION OF OUR PROCESS, PLAINTIFF'S "LEGAL" ENSLAVEMENT IS ILLEGAL, AND - LIKE THE STORY 12 YEARS A SLAVE - PLAINTIFF IS UNABLE TO PRESENT THAT ARGUMENT TO THE COURTS DUE TO DEFENDANTS' "NEW NORMAL."

239. MOREOVER, DEFENDANTS' OBSTRUCTIVE UNCONSTITUTIONAL RESTRICTIONS VIOLATE ALSO THE FEDERALLY-RECOGNIZED PRINCIPLES BEHIND JUNETEENTH. THE CORPORATIONS OF GOLDMAN SACHS GROUP INC., BANK OF AMERICA CORP., STANLEY BLACK & DECKER INC., GENERAL ELECTRIC CO., JP MORGAN CHASE & CO., AND OHIO STATE UNIVERSITY, ALSO HAVE MADE AFFIRMATIVE RECOGNITION OF JUNETEENTH, AS WELL AS 55 % OF ALL OTHER COMPANIES.

240. JUNETEENTH COMMEMORATES THE FACT THAT FOR TWO-AND-A-HALF-YEARS AFTER THE PRESIDENTIAL PROCLAMATION TO ABOLISH SLAVERY, THAT PERSONS REMAINED ENSLAVED DUE TO THE FACT THAT THE SLAVE HOLDERS PREVENTED THEIR HOSTAGES FROM KNOWING AND REALIZING THIS FACT. NOT UNTIL MILITARY INTERVENTION, TWO MONTHS AFTER THE CIVIL WAR, DID THE REMAINING 250,000 HOSTAGES IN TEXAS REALIZE THEIR FREEDOM HAD PREVIOUSLY BEEN PROCLAIMED.



241. IN THE VDOC/CWCC, PLAINTIFF IS BEING HELD IN THE SAME CIRCUMSTANCES AS THOSE FROM 1863 UNTIL 1865, IN THAT HE IS BEING PROHIBITED FROM ACTING ON AND PRESENTING HIS PETITIONS CONCERNING LAW AND ISSUES THAT WOULD FREE HIM IF HE HAD THE OPPORTUNITY TO PRESENT THEM. "THE NEW NORMAL" WILL LEAVE PLAINTIFF AND OTHERS SO SIMILARLY-SITUATED IN A PERPETUAL STATE OF INCARCERATION AND RESTRAINT IN THAT HE CANNOT CONTEST HIS UNCONSTITUTIONAL CONFINEMENT DUE TO THE RESTRICTIONS OF "THE NEW NORMAL".

242. CLAIM SEVEN: DEFENDANTS' ACTIONS IN DISREGARDING AND BLOCKING PLAINTIFF'S COMPLAINTS AND GRIEVANCES AND GRIEVANCE APPEALS WAS DELIBERATE INDIFFERENCE WHERE DEFENDANTS WERE MADE AWARE THAT PLAINTIFF WAS BEING DENIED CONSTITUTIONALLY PROTECTED RIGHTS TO ADEQUATE AND MEANINGFUL ACCESS TO THE COURTS AND LEGAL MATERIALS, RELIGIOUS SERVICES AND PROGRAMS, BUT DISREGARDED SUCH ISSUES. DEFENDANTS' DELIBERATE INDIFFERENCE IN THIS REGARD VIOLATES THE FIRST, FIFTH, SIX, EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 1, 3, 7, 8, 9, 11, 12 AND 16, OF THE VIRGINIA CONSTITUTION.

243. BOTH THE SETTLEMENT AGREEMENT AND THE MEMO FROM A. DAVID ROBINSON MADE CLEAR THAT COMPLAINTS AND GRIEVANCES THAT ARE COULD RELATED ARE TO BE PRIORITIZED AND THAT GRIEVANCES ARE TO BE FILED WITHOUT OBSTRUCTION, SO THERE IS

NO EXCUSE.

244. **CLAIM EIGHT:** DEFENDANTS' ACTIONS VIOLATED THE Ku Klux Klan Act of 1871. DEFENDANTS' ACTIONS WERE CONSPIRATORIAL WHERE THEY DENIED PLAINTIFF ADEQUATE AND MEANINGFUL ACCESS TO THE COURTS AND LEGAL MATERIALS, AND ABILITY TO PETITION THE GOVERNMENT FOR REDRESS OF HIS GRIEVANCES. SUCH ACTIONS EFFECTIVELY AND CONSEQUENTLY PREVENTS PLAINTIFF FROM VOTING, HOLDING PUBLIC OFFICE, TESTIFYING IN COURT, AND FROM SERVING ON A JURY BECAUSE, WITHOUT SUCH ACCESS AND ABILITY, PLAINTIFF IS UNABLE TO CHALLENGE AND BRING TO AN END HIS UNCONSTITUTIONAL CONFINEMENT, RESTRAINT AND STATE OF CIVIL DEATH.

245. **CLAIM NINE:** DEFENDANTS' ACTIONS IN DENYING PLAINTIFF ACCESS TO ATTEND AND PARTICIPATE IN HIS RELIGIOUS SERVICES AND PROGRAMS, AS WELL AS DECREASING THE SERVICE TIMES PER MONTH, VIOLATES THE RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT (RLUIPA). PLAINTIFF'S SINCERELY-HELD RELIGIOUS BELIEFS AND PRACTICES REQUIRES THAT HE MEET WITH HIS RELIGIOUS COMMUNITY, AND DO SO AT LEAST TWICE A WEEK, DURING THE MONTH OF RAMADAN ON A DAILY BASIS AND EAT IN A CONGREGATIONAL SETTING, AS WELL AS ATTEND AND PARTICIPATE WITH ANY OTHER RELIGIOUS HOLIDAY HELD BY HIS RELIGIOUS GROUP - AS ALREADY RECOGNIZED BY THE WDC IN THEIR OPERATING PROCEDURE.

246. **CLAIM TEN:** DEFENDANTS' ACTIONS OF WRITING, IMPLEMENTING, AND RESTRICTING PLAINTIFF IN ACCORDANCE WITH, "THE NEW NORMAL", IS EFFECTIVELY A SECESSION AGAINST THE UNITED STATES OF AMERICA, AND AN ACT OF TREASON, IN VIOLATION OF THE FIRST, FIFTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENTS OF THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 1, 2, 3, 7, 9, 12, AND 14 OF THE VIRGINIA CONSTITUTION.

247. "THE NEW NORMAL" EFFECTIVELY MAKES INACCESSIBLE - IF NOT THROWS OUT ENTIRELY - THE CONSTITUTIONS OF THE UNITED STATES AND VIRGINIA, AS WELL AS THE OPERATING PROCEDURE OF THE UDOC.

248. **CLAIM ELEVEN:** DEFENDANTS' ACTIONS IN ESTABLISHING A SYSTEM TO KEEP TRACK OF AND MAKE KNOWN TO OTHER PRISONERS, STATE MEMBERS, AND THE PUBLIC PLAINTIFF'S "VACCINATION" "STATUS", WHICH IS PLAINTIFF'S PERSONAL MEDICAL INFORMATION AND INVOLVES PLAINTIFF'S OTHER MEDICAL REASONS FOR NOT WANTING THE "VACCINE", IS A VIOLATION OF THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA). PLAINTIFF HAS A RIGHT TO REFUSE UNWANTED MEDICAL TREATMENT. DEFENDANTS MAY NOT PUNISH PLAINTIFF IN ANY WAY FOR EXERCISE OF HIS RIGHT AND DEFENDANTS MAY NOT ESTABLISH A SYSTEM SO AS TO MAKE PUBLIC PLAINTIFF'S MEDICAL CHOICES, PROCEDURES OR HISTORY.

249. CLAIM TWELVE: AS ACTIONABLE UNDER 28 U.S.C., SECTION 1367, DEFENDANTS ARE LIABLE FOR INTENTIONAL TORTS AND NEGLIGENCE, AS WELL AS FOR DEFAMATION, SLANDER AND LIBEL, WHERE DEFENDANTS FALSELY AND MALICIOUSLY ALLEGED AND SPREAD RUMORS THAT BECAUSE PLAINTIFF WOULD NOT BE INFECTED WITH THE COVID "VACCINE," PLAINTIFF WAS A CONTAGIOUS HEALTH HAZARD TO OTHERS, DESPITE THE FACT THAT PLAINTIFF ALREADY HAD COVID AND WAS THUS NATURALLY IMMUNE FROM CONTRACTING AND SPREADING COVID. PLAINTIFF WAS ACTUALLY IN THE SAME - IF NOT BETTER - POSITION AND SITUATION THAN THOSE WHO HAD BEEN "VACCINATED."

250. CLAIM THIRTEEN: DEFENDANTS' CONDUCT IN KEEPING THE VENTILATION SYSTEM TURNED OFF IN THE HOUSING UNITS AND LIMITING ACCESS TO OUTSIDE AIR TO ONE HOUR PER DAY, FOR 80 PEOPLE IN A DORM AT CNCC, IN WHICH THERE ARE AT LEAST 12 SUCH DORMS, SINCE MARCH 2020, DESPITE THE FACT THAT THERE IS A HIGHLY-TRANSMISSIBLE AND COMMUNICABLE COVID-19 VIRUS, IS CRUEL AND UNUSUAL PUNISHMENT IN VIOLATION OF THE FIFTH, EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION AS WELL AS ARTICLE 1, SECTIONS 3, 7 AND 9 OF THE VIRGINIA CONSTITUTION.

251. IT HAS BEEN CLEARELY ASSERTED BY SCIENTISTS, EXPERTS, AND PUBLIC-HEALTH OFFICIALS, THAT FRESH AIR AND INCREASED AND SUFFICIENTLY ADEQUATE VENTILATION IS NECESSARY TO DECREASE AIRBORNE COVID TRANSMISSION AND EXPOSURE.

252. **CLAIM FOURTEEN:** MANY OFFICIALS WHO ARE PUSHING AND MANDATING COVID "VACCINES" AND WHO ARE EXTENDING COVID PROCEDURES, ARE ALSO PROFITING FROM SUCH ACTIONS. SUCH CONDUCT BY OFFICIALS, ACTING IN THEIR OFFICIAL CAPACITY, REPRESENTS A CONFLICT OF INTEREST. DEFENDANTS IN THE INSTANT CASE ARE IN SUCH A CAPACITY AS TO PUSH MANDATES AND PROFIT FROM SUCH MANDATES. SUCH CONDUCT VIOLATES ARTICLE 1, SECTION 4 OF THE VIRGINIA CONSTITUTION. THIS SECTION MAKES CLEAR THAT NO MAN, OR SET OF MEN, ARE ALLOWED TO PERSONALLY PROFIT OR BE PERSONALLY PRIVILEGED IN ANY WAY THROUGH THEIR SERVICE TO THEIR PUBLIC ADMINISTRATIVE POSITIONS.

253. **CLAIM FIFTEEN:** DEFENDANTS' CONDUCT IN RETALIATING AGAINST PLAINTIFF FOR COMPLAINING THAT HIS CONSTITUTIONALLY PROTECTED RIGHTS TO i) HAVE ADEQUATE AND MEANINGFUL ACCESS TO LEGAL MATERIALS AND THE COURTS; ii) BE ALLOWED TO ATTEND HIS RELIGIOUS SERVICES; iii) BE FREE FROM DISCRIMINATION; iv) BE SECURE IN HIS PERSON; v) NOT BE SUBJECTED TO CRUEL AND UNUSUAL PUNISHMENT(S); vi) NOT BE DENIED LIFE, LIBERTY OR PROPERTY WITHOUT DUE PROCESS OF LAW; vii) EQUAL PROTECTION UNDER THE LAW; AND viii) BE ALLOWED TO PETITION THE GOVERNMENT FOR REDRESS OF HIS GRIEVANCES, VIOLATED THE FIRST, FOURTH, FIFTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION AS WELL AS ARTICLE 1, SECTIONS 1, 3, 7, 8, 9, 11, 12, 15 AND 16 OF THE CONSTITUTION OF VIRGINIA.



254. CLAIM SIXTEEN: DEFENDANTS' ACTIONS IN DENYING PLAINTIFF ACCESS TO ATTEND AND PARTICIPATE IN HIS RELIGIOUS SERVICES AND PROGRAMS, WORK, VISITATION, AND THE LAW LIBRARY BASED UPON HIS SO-CALLED "VACCINATION STATUS," VIOLATES THE AMERICANS WITH DISABILITIES ACT (ADA) AND SECTION 504 OF THE REHABILITATION ACT OF 1973 (SECTION 504). DEFENDANTS HAVE TREATED PLAINTIFF'S "VACCINATION STATUS" AS A DISABILITY, AND THEREFORE SUCH QUALIFIES UNDER THE TERM OF THESE LAWS, WHEREAS IDOC/CWCC RECEIVES FEDERAL FUNDING.

255. ADA'S TITLE II PROVIDES:

[N]O QUALIFIED INDIVIDUAL WITH A DISABILITY SHALL, BY REASON OF SUCH DISABILITY, BE EXCLUDED FROM PARTICIPATION IN OR BE DENIED THE BENEFITS OF THE SERVICES, PROGRAMS, OR ACTIVITIES OF A PUBLIC ENTITY, OR BE SUBJECTED TO DISCRIMINATION BY ANY SUCH ENTITY. (ADA, 42 U.S.C., SECTION 12132)).

256. SECTION 504 STATES:

NO OTHERWISE QUALIFIED INDIVIDUAL WITH A DISABILITY... SHALL, SOLELY BY REASON OF HER OR HIS DISABILITY, BE EXCLUDED FROM THE PARTICIPATION IN, BE DENIED THE BENEFITS OF,

OR BE SUBJECTED TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY CONDUCTED BY ANY [FEDERAL] EXECUTIVE AGENCY. (REHABILITATION ACT OF 1973, 29 U.S.C., SECTION 794 (a)).

## REQUEST FOR RELIEF

WHEREFORE, PLAINTIFF REQUESTS THAT THE COURT GRANT THE FOLLOWING RELIEF:

A. ISSUE A DECLARATORY JUDGMENT STATING THAT:

1. DEFENDANTS' MANDATES AND ACTS TO COMPEL THAT PLAINTIFF BE INJECTED WITH A COVID-19 "VACCINE," AND ALL ACTIONS RELATED THERETO, VIOLATED THE FIFTH, EIGHT AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE I, SECTIONS 1, 3, 8, 9 AND 11 OF THE VIRGINIA CONSTITUTION.

2. DEFENDANTS' MANDATES AND ACTS TO COMPEL THAT PLAINTIFF BE INJECTED WITH A COVID-19 "VACCINE," VIOLATED THE NINTH AND TENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE I, SECTIONS 1, 2, 3, 7 AND 17 OF THE VIRGINIA CONSTITUTION.

3. DEFENDANTS' ACTIONS IN PUNISHING PLAINTIFF AND BLOCKING HIM FROM HIS RELIGIOUS SERVICES, THE LAW LIBRARY AND LEGAL MATERIALS, WORK, PROGRAMS, VISITATION, ETC., VIOLATED THE FIRST, FIFTH, EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 1, 2, 3, 7, 11 AND 16 OF THE VIRGINIA CONSTITUTION.

4. DEFENDANTS' ACTIONS IN DENYING PLAINTIFF ACCESS AND ATTENDANCE OF HIS RELIGIOUS SERVICE BECAUSE HE IS "UNVACCINATED", WHILE ALLOWING AND COMPELLING BOTH "VACCINATED" AND "UNVACCINATED" PRISONERS TO ATTEND THE STATE-SPONSORED RE-ENTRY PROGRAM TOGETHER, VIOLATED THE FIRST, FIFTH, EIGHTH, NINTH, TENTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 1, 2, 3, 7, 8, 9, 11, 12, 16 AND 17 OF THE VIRGINIA CONSTITUTION.

5. DEFENDANTS' IMPLEMENTATION AND ENFORCEMENT OF THEIR SO-CALLED "NEW NORMAL" VIOLATES THE NINTH, TENTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 2, 3 AND 7 OF THE VIRGINIA

Constitution.

6. DEFENDANTS' ACTIONS IN DETAINING AND RESTRAINING PLAINTIFF WHILE DENYING PLAINTIFF ABILITY TO SEEK RELIEF FOR HIS UNCONSTITUTIONAL CONFINEMENT AND RESTRAINT VIOLATED THE FIRST, FIFTH, THIRTEENTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 1, 2, 3 AND 7 OF THE VIRGINIA CONSTITUTION.

7. DEFENDANTS' ACTIONS IN DISREGARDING AND BLOCKING PLAINTIFF'S COMPLAINTS AND GRIEVANCES AND GRIEVANCE APPEALS WAS DELIBERATE INDIFFERENCE WHERE DEFENDANTS WERE MADE AWARE THAT PLAINTIFF WAS BEING DENIED HIS CONSTITUTIONALLY PROTECTED RIGHTS TO ADEQUATE AND MEANINGFUL ACCESS TO THE COURTS AND LEGAL MATERIALS, RELIGIOUS SERVICES AND PROGRAMS, BUT DISREGARDED SUCH ISSUES. DEFENDANTS' DELIBERATE INDIFFERENCE IN THIS REGARD VIOLATED THE FIRST, FIFTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 1, 3, 7, 8, 9, 11, 12 AND 16, OF THE VIRGINIA CONSTITUTION.

8. DEFENDANTS' CONSPIRATORIAL ACTIONS VIOLATED THE KU KLUX KLAN ACT OF 1871 WHERE DEFENDANTS DENIED

PLAINTIFF ADEQUATE AND MEANINGFUL ACCESS TO THE COURTS AND LEGAL MATERIALS, AND ABILITY TO PETITION THE GOVERNMENT FOR REDRESS OF HIS GRIEVANCES. SUCH ACTIONS EFFECTIVELY AND CONSEQUENTLY, PREVENTED PLAINTIFF FROM VOTING, HOLDING PUBLIC OFFICE, TESTIFYING IN COURT, AND FROM SERVING ON A JURY.

9. DEFENDANT'S ACTIONS IN DENYING PLAINTIFF ACCESS TO ATTEND AND PARTICIPATE IN HIS RELIGIOUS SERVICES AND PROGRAMS, AS WELL AS THE DECREASE OF SERVICE TIMES PER MONTH, VIOLATED THE RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT (RLUIPA).

10. DEFENDANTS' ACTIONS OF WRITING AND IMPLEMENTING AND RESTRICTING PLAINTIFF IN ACCORDANCE WITH "THE NEW NORMAL," VIOLATED THE FIRST, FIFTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENTS OF THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 1, 2, 3, 7, 9, 12 AND 14 OF THE VIRGINIA CONSTITUTION.

11. DEFENDANTS' ACTIONS VIOLATED THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA) WHERE THEY ESTABLISHED A SYSTEM TO KEEP TRACK OF AND MAKE KNOWN TO OTHER PRISONERS, STAFF MEMBERS, AND THE



PUBLIC PLAINTIFF'S "VACCINATION" "STATUS", WHICH IS PLAINTIFF'S PERSONAL MEDICAL INFORMATION AND INVOLVES PLAINTIFF'S OTHER MEDICAL REASONS FOR NOT WANTING THE "VACCINE."

12. DEFENDANTS ARE LIABLE FOR INTENTIONAL TORTS AND NEGLIGENCE UNDER 28 U.S.C., SECTION 1367, AS WELL AS FOR DEFAMATION, SLANDER AND LIBEL, WHERE DEFENDANTS FALSELY AND MALICIOUSLY ALLEGED AND SPREAD RUMORS THAT BECAUSE PLAINTIFF WOULD NOT BE INJECTED WITH THE COVID "VACCINE", PLAINTIFF WAS A CONTAGIOUS HEALTH HAZARD TO OTHERS.

13. DEFENDANTS ACTIONS IN KEEPING THE VENTILATION SYSTEM TURNED OFF IN THE HOUSING UNITS AND LIMITING PLAINTIFF'S ACCESS TO OUTSIDE AIR TO ONE-HOUR-PER-DAY, SINCE MARCH 2020, DESPITE THE FACT THAT THERE IS A HIGHLY-TRANSMISSIBLE AND COMMUNICABLE COVID-19 VIRUS, IS CRUEL AND UNUSUAL PUNISHMENT IN VIOLATION OF THE FIFTH, EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION AS WELL AS ARTICLE 1, SECTIONS 3, 7 AND 9 OF THE VIRGINIA CONSTITUTION.

14. DEFENDANTS CONDUCT VIOLATED ARTICLE 1, SECTION 4 OF THE VIRGINIA CONSTITUTION BY PUSHING AND MANEUVERING

COVID "VACCINES" AND EXTENDING COVID PROCEDURES WHILE ALSO PROFITING FROM SUCH ACTIONS.

15. DEFENDANTS' CONDUCT IN RETALIATING AGAINST PLAINTIFF FOR COMPLAINING ABOUT THE DENIAL OF HIS CONSTITUTIONALLY PROTECTED RIGHTS, VIOLATED THE FIRST, FOURTH, FIFTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION, AS WELL AS ARTICLE 1, SECTIONS 1, 3, 7, 8, 9, 11, 12, 15 AND 16 OF THE CONSTITUTION OF VIRGINIA.

16. DEFENDANTS' ACTIONS IN DENYING PLAINTIFF ACCESS TO ATTEND AND PARTICIPATE IN HIS RELIGIOUS SERVICES AND PROGRAMS, WORK, VISITATION, AND THE LAW LIBRARY BASED UPON HIS SO-CALLED "VACCINATION STATUS," VIOLATED THE AMERICANS WITH DISABILITIES ACT (ADA) AND SECTION 504 OF THE REHABILITATION ACT OF 1973 (SECTION 504).

B. ISSUE AN INJUNCTION ORDERING DEFENDANTS TO:

1. IMMEDIATELY CEASE AND DESIST MANIPULATING UPON PLAINTIFF TO TAKE A COVID - VACCINE.

2. IMMEDIATELY RESTORE PLAINTIFF WITH ALL RIGHTS AND PRIVILEGES AS THOSE WHO ARE VACCINATED.
3. IMMEDIATELY RESTORE PLAINTIFF WITH ALL RIGHTS AND PRIVILEGES AS BEFORE THE "NEW NORMAL."
4. IMMEDIATELY DISCONTINUE AND RESCIND THE "NEW NORMAL" POLICY.
5. IMMEDIATELY RETURN CHRC TO NORMAL OPERATIONS AS BEFORE THE LOCKDOWN, STATE-OF-EMERGENCY, AND "NEW NORMAL."
6. IMMEDIATELY CEASE AND DESIST SPREADING FALSE RUMORS AGAINST PLAINTIFF THAT HE PRESENTS A HEALTH RISK TO OTHERS BECAUSE HE IS NOT "VACCINATED".
7. IMMEDIATELY CEASE AND DESIST ESTABLISHED SYSTEM OF KEEPING TRACK OF AND MAKING KNOWN TO OTHER PRISONERS, STAFF AND THE PUBLIC PLAINTIFF'S "VACCINATION" STATUS.
8. IMMEDIATELY CEASE AND DESIST GIVING MEDICAL ADVICE, INQUIRIES OR RECOMMENDATIONS, OR ACTING IN ANY CAPACITY AS A MEDICAL PROFESSIONAL.

9. IMMEDIATELY ALLOW PLAINTIFF TO ATTEND HIS RELIGIOUS SERVICES - WHICH HE HAS BEEN DENIED SINCE MARCH 2020, AND ALLOW HIM TO HAVE ADEQUATE AND MEANINGFUL ACCESS TO THE COURTS AND LEGAL MATERIALS.

10. IMMEDIATELY CEASE AND DESIST BLOCKING PLAINTIFF'S GRIEVANCES AND GRIEVANCE APPEALS.

11. IMMEDIATELY ALLOW PLAINTIFF ADDITIONAL ACCESS TO OUTSIDE AIR AND VENTILATION IN THE HOUSING UNIT.

12. IMMEDIATELY CEASE AND DESIST ANY INDIVIDUAL PROFITING FROM ADMINISTRATION OF COVID "VACCINES" OR ENFORCEMENT OF COVID EMERGENCY PANDEMIC PROTOCOLS.

C. FOR EACH OF THE CLAIMS ABOVE, PLAINTIFF SEEKS AWARD OF NOMINAL/COMPENSATORY/PUNITIVE DAMAGES (INCLUDING FOR PSYCHOLOGICAL DAMAGE INCLUDING PERSONAL HUMILIATION AND MENTAL ANGUISH, LOSS OF LIBERTY AND INJURIES TO PLAINTIFF'S QUALITY OF LIFE, LIVING CONDITIONS, DEPRIVATION OF PRIVILEGES, AND FAILURE TO ACCOMMODATE "DISABILITIES") AGAINST DEFENDANTS, JOINTLY AND SEVERALLY, AS FOLLOWS:

1. RE. CLAIM ONE: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.

2. RE. CLAIM TWO: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.

3. RE. CLAIM THREE: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.

4. RE. CLAIM FOUR: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.

5. RE. CLAIM FIVE: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.

6. RE. CLAIM SIX: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.

7. RE. CLAIM SEVEN: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.

8. RE. CLAIM EIGHT: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.

9. RE. CLAIM NINE: \$1.00 NOMINAL / \$3,750.00  
COMPENSATORY / \$40,000.00 PUNITIVE DAMAGES.



10. RE. CLAIM TEN: \$1.00 nominal / \$3,750.00  
compensatory / \$40,000.00 PUNITIVE DAMAGES.

11. RE. CLAIM ELEVEN: \$1.00 nominal / \$3,750.00  
compensatory / \$40,000.00 PUNITIVE DAMAGES.

12. RE. CLAIM TWELVE: \$1.00 nominal / \$3,750.00  
compensatory / \$40,000.00 PUNITIVE DAMAGES.

13. RE. CLAIM THIRTEEN: \$1.00 nominal / \$3,750.00  
compensatory / \$40,000.00 PUNITIVE DAMAGES.

14. RE. CLAIM FOURTEEN: \$1.00 nominal / \$3,750.00  
compensatory / \$40,000.00 PUNITIVE DAMAGES.

15. RE. CLAIM FIFTEEN: \$1.00 nominal / \$3,750.00  
compensatory / \$40,000.00 PUNITIVE DAMAGES.

16. RE. CLAIM SIXTEEN: \$1.00 nominal / \$3,750.00  
compensatory / \$40,000.00 PUNITIVE DAMAGES.

17. LEGAL FEES, COSTS, FILING FEES, COPIES,  
LEGAL RESEARCH, LEGAL SUPPLIES, HOURS WORKED:  
\$10,984.00.

D. GRANT OTHER RELIEF AS IT MAY APPEAR PLAINTIFF IS ENTITLED.

## PLACES OF INCARCERATION

PLAINTIFF HAS BEEN AT COFFEEWOOD CORRECTIONAL CENTER, 12352 COFFEEWOOD DRIVE, MITCHELLS, VIRGINIA 22729, FOR OVER THE LAST SIX MONTHS.

## CONSENT

PLAINTIFF HAS BEEN ADVISED OF HIS RIGHT, PURSUANT TO 28 U.S.C., SECTION 636(c), TO HAVE A U.S. MAGISTRATE JUDGE PRESIDE OVER A TRIAL, WITH APPEAL TO THE U.S. COURT OF APPEALS FOR THE FOURTH CIRCUIT.

PLAINTIFF DOES NOT CONSENT TO PROCESS BEFORE A U.S. MAGISTRATE JUDGE.

RESPECTFULLY SUBMITTED,



Raymond A. Ford, Jr. #1187664 ASE  
COFFEEWOOD CORRECTIONAL CENTER  
12352 COFFEEWOOD DRIVE  
MITCHELLS, VIRGINIA 22729

## AFFIDAVIT

I, Raymond A. Ford, Jr., do hereby certify and swear under penalty of perjury that the statements and facts set forth in this civil rights action complaint under 42 U.S.C., section 1983 are true and accurate to the best of my knowledge and belief and I am ready, willing and competent to testify to the matters stated herein.

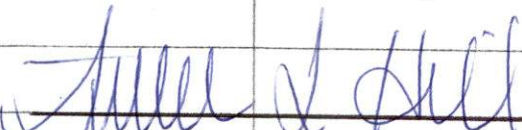
EXECUTED ON: March 4, 2022

DATE



Raymond A. Ford, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME  
ON THIS 4<sup>th</sup> DAY OF March, 2022.

  
NOTARY PUBLIC

My commission EXPIRES  
on: 5/31/2022

Raymond A. Ford, Jr. #1187664  
CoffeeWood Correctional Center  
12352 CoffeeWood Drive  
Mitchells, Virginia 22729





Raymond A. Ford, Jr. #1187669

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MITCHELLS, VIRGINIA 22729



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